

CHRONOLOGY OF DOCUMENTS  
MARTHA C. ROSE CHEMICALS, INC.

AUG 13 1986

Site:	<i>Martha Rose Chem</i>
ID#:	<i>MOD 980633069</i>
Break:	<i>17.7</i>
Other:	<i>NID</i>

RECORD NUMBER 1  
12/18/79 CODE: LEAR/SIEGL  
SUBLEASE BETWEEN LESSOR TO W. C. CAROLAN CO., INC.

078D

RECORD NUMBER 2  
03/03/80 CODE: HOLDEN  
CITY OF HOLDEN CONSENT TO SUBLEASE TO WALTER C.  
CAROLAN.

RECORD NUMBER 3  
06/16/81 CODE: LET EPA D  
LETTER FROM PCB ELIMINATORS TO WILLIAM RICE,  
DEPUTY REGIONAL ADMINISTRATOR, TRANSMITTING  
PROCESS DESIGN INFORMATION AND REQUESTING APPROVAL  
FOR CHEMICAL METHOD TO DISPOSE OF PCBs.

RECORD NUMBER 4  
06/30/81 CODE: MEMO EPA  
MEMO FROM LEO ALDERMAN TO ROBERT MORBY  
TRANSMITTING A JUNE 25, 1981, LETTER FROM PCB  
ELIMINATORS TO WOLFGANG BRANDNER. THIS LETTER  
SUMMARIZES A JUNE 17, 1981, MEETING AND LISTS  
INFORMATION REQUIRED FOR AN APPLICATION.

RECORD NUMBER 5  
07/28/81 CODE: PHONE ROSE  
TELEPHONE CONVERSATION RECORD FROM WOLFGANG  
BRANDNER TO PCB ELIMINATORS CONFIRMING TEST OF OIL  
PROCESS FOR AUGUST 13, 1981.

RECORD NUMBER 6  
08/04/81 CODE: MEMO EPA  
MEMO FROM LEO ALDERMAN TO ROBERT MORBY  
TRANSMITTING A LETTER RECEIVED FROM PCB  
ELIMINATORS TO WOLFGANG BRANDNER DATED JULY 30,  
1981. THE LETTER CONFIRMS DATE OF PROCESS  
DEMONSTRATION FOR AUGUST 13, 1981.

RECORD NUMBER 7  
08/05/81 CODE: LET EPA A  
LETTER FROM REGION VI TO PCB ELIMINATORS STATING  
UNABLE TO ATTEND 8/13/81 DEMONSTRATION OF MOBILE  
UNIT

RECORD NUMBER 8  
08/13/81 CODE: MEMO EPA  
RECEIPT FOR TWO SAMPLES FROM PCB ELIMINATORS BY  
GENERAL TESTING LABORATORY, INC.



40024462  
SUPERFUND RECORDS

RECORD NUMBER 9  
08/27/81 CODE: LET EPA A  
LETTER FROM REGION VII TO PCB ELIMINATORS STATING  
ADDITIONAL INFORMATION IS REQUIRED FOR OPERATION  
OF FULL SCALE UNIT.

RECORD NUMBER 10  
08/28/81 CODE: LET EPA A  
LETTER FROM EPA TO PCB ELIMINATORS STATING  
ADDITIONAL INFORMATION IS REQUIRED FOR APPROVAL TO  
PROCESS PCBs ON A CONTINUING BASIS AS WELL AS A  
DEMONSTRATION IS REQUIRED WITH THE FULL-SCALE  
EQUIPMENT.

RECORD NUMBER 11  
09/02/81 CODE: MEMO EPA  
ANALYTICAL DATA REPORT FOR BENCH SCALE  
DEMONSTRATION AT PCB ELIMINATORS.

RECORD NUMBER 12  
02/19/82 CODE: PHONE COPS  
TELEPHONE CONVERSATION RECORD FROM BEN CASEY TO  
EPA. CASEY IS WITH THE KANSAS CITY POLICE  
DEPARTMENT. PCB ELIMINATORS WERE BEING  
INVESTIGATED BECAUSE PERSONS INVOLVED HAVE SHADY  
BACKGROUND.

RECORD NUMBER 13  
03/26/82 CODE: APPLICATION  
MCR APPLICATION (PCB ELIMINATORS) FOR OIL PROCESS

RECORD NUMBER 14  
06/22/82 CODE: LET EPA A  
LETTER FROM PCB ELIMINATORS TO JOHN FRANKE, EPA  
REGION VII REGIONAL ADMINISTRATOR, PROVIDING  
ADDITIONAL INFORMATION ON THE STRIPPER COLUMN AND  
EFFLUENTS FROM THE PCB OIL PROCESS.

RECORD NUMBER 15  
07/12/82 CODE: MEMO EPA  
MEMO FROM ROBERT MORBY TO MIKE SANDERSON STATING  
THAT THE KANSAS CITY POLICE DEPARTMENT IS  
INVESTIGATING PCB ELIMINATORS, BUT APPROVAL  
RECOMMENDATIONS SHOULD BE MADE FROM THE TECHNICAL  
REVIEW.

RECORD NUMBER 16  
08/25/82 CODE: APPROVAL  
INTERIM APPROVAL TO MARTHA C. ROSE, DBA PCB  
ELIMINATORS, TO PROCESS PCB MINERAL OIL.  
EFFECTIVE SEPTEMBER 15, 1982, TO MARCH 15, 1983.

RECORD NUMBER 17  
09/02/82 CODE: APPLICATION  
APPLICATION TO PROCESS FOR DISPOSAL PCB CAPACITORS

RECORD NUMBER 18  
09/21/82 CODE: LET ROSE A  
LETTER FROM MARTHA C. ROSE TO WILLIAM RICE, DEPUTY  
REGIONAL ADMINISTRATOR FOR REGION VII, GIVING  
30-DAY NOTIFICATION OF PROCESSING OF PCBs (OIL).

RECORD NUMBER 19  
10/18/82 CODE: APPROVAL  
INTERIM APPROVAL TO MARTHA C. ROSE TO PROCESS PCB  
MINERAL OIL. EFFECTIVE SEPTEMBER 15, 1982 TO  
MARCH 15, 1983 (SEE AUGUST 25, 1982 APPROVAL).  
THIS APPEARS TO BE A NAME CHANGE.

RECORD NUMBER 20  
10/19/82 CODE: LET EPA A  
EPA LETTER TO ROSE IN RESPONSE TO ROSE LETTER OF  
AUGUST 30, 1982 (ISSUED APPROVAL WITH ROSE NAME  
INSTEAD OF PCB ELIMINATORS).

RECORD NUMBER 21  
11/19/82 CODE: APPROVAL  
LETTER TO ROSE DENYING CAPACITOR APPROVAL  
(SEPTEMBER 2, 1982, SUBMISSION).

RECORD NUMBER 22  
12/02/82 CODE: APPLICATION  
ROSE RESUBMITTED APPLICATION FOR CAPACITORS  
(INITIAL SUBMISSION SEPTEMBER 2, 1982).

RECORD NUMBER 23  
12/14/82 CODE: APPLICATION  
LETTER FROM MARTHA C. ROSE TO EPA REQUESTING  
AMENDMENT OF INTERIM APPROVAL (OIL) TO INCLUDE GAS  
CONDENSATE. INCLUDES CHARACTERIZATION OF GAS  
CONDENSATE.

RECORD NUMBER 24  
12/14/82 CODE: LET ROSE A  
SUBMITTED CLOSURE AND QUALITY ASSURANCE PLANS -  
REQUESTED IN INTERIM OIL APPROVAL DATED SEPTEMBER  
15, 1982.

RECORD NUMBER 25  
02/08/83 CODE: MEMO EPA  
MEMO FROM DAVID WAGONER TO MORRIS KAY RECOMMENDING  
APPROVING ROSE CAPACITOR PROCESS AND INDICATES  
WHERE DECONTAMINATION LEVEL CAME FROM.

RECORD NUMBER 26  
02/09/83 CODE: APPLICATION  
LETTER FROM MARTHA C. ROSE TO EPA PROPOSING TO  
DISPOSE OF PCB TRANSFORMERS.

RECORD NUMBER 27  
02/16/83 CODE: APPROVAL  
INTERIM CAPACITOR APPROVAL (4-1-83 TO 10-1-83).

RECORD NUMBER 28  
02/17/83 CODE: LET ROSE A  
CLOSURE PLANS

RECORD NUMBER 29  
02/22/83 CODE: LET EPA A  
LETTER FROM EPA TO MARTHA C. ROSE, REQUESTING  
ADDITIONAL INFORMATION REGARDING THE FEBRUARY 9,  
1983, APPLICATION TO DISPOSE OF PCB TRANSFORMERS.

RECORD NUMBER 30  
02/24/83 CODE: LET EPA A  
LETTER FROM LYNN HARRINGTON, RCRA, TO ROSE  
REQUESTING ADDITIONAL INFORMATION ON DECEMBER 14,  
1982, REQUEST TO PROCESS GAS CONDENSATE.

RECORD NUMBER 31  
03/02/83 CODE: LET ROSE A  
SUMMARY OF PCB ACTIVITY TO SATISFY CONDITION OF  
OIL PROCESSING APPROVAL. FROM MARTHA C. ROSE TO  
STEVE BUSCH.

RECORD NUMBER 32  
03/03/83 CODE: MEMO EPA  
MEMO FROM DAVID WAGONER TO MORRIS KAY REQUESTING  
ISSUING OF FINAL APPROVAL TO MARTHA C. ROSE TO  
DESTROY PCB OIL, LESS THAN 10,000 PPM.

RECORD NUMBER 33  
03/10/83 CODE: LET ROSE A  
LETTER TO LYNN HARRINGTON, RCRA, FROM ROSE  
TRANSMITTING FLOW DIAGRAM AND DRAWINGS OF  
PROCESSING UNIT FOR GAS CONDENSATE. THIS IS IN  
RESPONSE TO A FEBRUARY 24, 1983, LETTER FROM EPA.

RECORD NUMBER 34  
03/10/83 CODE: APPROVAL  
APPROVAL TO PROCESS PCB MINERAL OIL UP TO 10,000  
PARTS PER MILLION. EFFECTIVE MARCH 15, 1983 TO  
MARCH 15, 1986.

RECORD NUMBER 35  
04/11/83 CODE: APPLICATION  
APPLICATION TO DISPOSE OF PCB TRANSFORMERS IN  
RESPONSE TO FEBRUARY 23, 1983, LETTER FROM EPA  
REQUESTING ADDITIONAL INFORMATION.

RECORD NUMBER 36  
04/18/83 CODE: LET EPA A  
LETTER TO ROSE TELLING THEM HQ APPROVING MOBILES  
PCB DISPOSAL FACILITIES

RECORD NUMBER 37  
05/12/83 CODE: LET ROSE A  
LETTER TO DAVID WAGONER FROM MARTHA C. ROSE  
CHEMICAL COMPANY REQUESTING HIGHER PRIORITY BE  
GIVEN TO GAS CONDENSATE PROPOSAL DATED DECEMBER  
14, 1982.

RECORD NUMBER 38  
05/31/83 CODE: LET EPA A  
LETTER FROM DAVID WAGONER, EPA, TO MCR IN RESPONSE  
TO MAY 12, 1983, LETTER FROM MCR. THIS LETTER  
REQUESTS ADDITIONAL INFORMATION REGARDING GAS  
CONDENSATE PROCESS.

RECORD NUMBER 39  
06/23/83 CODE: LET ROSE A  
JUNE 23, 1983, LETTER WAS RECEIVED BY EPA ON JUNE  
30, 1983. IT WAS THE CLOSURE PLANS.

RECORD NUMBER 40  
06/30/83 CODE: APPLICATION  
A DESCRIPTION OF PROCESS EQUIPMENT AND DISPOSAL  
PROCEDURES OF PCB GAS CONDENSATE.

RECORD NUMBER 41  
07/08/83 CODE: LET ROSE A  
LETTER TO MORRIS KAY, NOTIFICATION OF INTENT TO  
BEGIN PROCESSING PCB TRANSFORMERS FOR R&D,  
BEGINNING 8/18/83.

RECORD NUMBER 42  
07/08/83 CODE: APPROVAL  
LETTER TO WALTER CAROLAN GRANTING APPROVAL TO  
PROCESS PCB TRANSFORMERS FOR R&D PURPOSES,  
APPROVAL EFFECTIVE 8/1/83 UNTIL 2/1/84.

RECORD NUMBER 43  
07/25/83 CODE: LET ROSE A  
LETTER TO MORRIS KAY FROM MCR REQUESTING A HIGHER  
PRIORITY FOR REVIEW OF CONDENSATE PROPOSAL DATED  
DECEMBER 14, 1982.

RECORD NUMBER 44  
09/13/83 CODE: LET ROSE  
ROSE LETTER

RECORD NUMBER 45  
09/14/83 CODE: LET ROSE A  
ROSE LETTER TO MORRIS KAY, CAPACITOR PROCESSING  
SUMMARY AS REQUIRED IN INTERIM APPROVAL.

RECORD NUMBER 46  
09/26/83 CODE: LET ROSE A  
LETTER TO MORRIS KAY (ATTENTION STEVE BUSCH)  
REGARDING FORMAL APPLICATION FOR APPROVAL FOR  
CAPACITOR CORE MATERIAL REDUCTION METHOD.

RECORD NUMBER 47  
09/30/83 CODE: LET ROSE O  
LETTER FROM MCR TO REP. TOM COLEMAN STATING EPA  
ISSUED RULES IN POLICY STATEMENTS 6-PCB-1 THROUGH  
6-PCB-7 WITHOUT A HEARING. ATTACHED IS 10-12-83  
LETTER TO COLEMAN SUMMARIZING 10-4-83 MEETING  
BETWEEN COLEMAN'S STAFF AND ROSE

RECORD NUMBER 48  
09/30/83 CODE: LET EPA A  
LETTER TO MARTHA C. ROSE FROM LYNN HARRINGTON,  
RCRA, STATING DEFICIENCIES IN JUNE 30, 1983,  
APPLICATION TO DISPOSE OF PCB CONTAMINATED GAS  
PIPELINE CONDENSATE.

RECORD NUMBER 49  
10/11/83 CODE: LET ROSE O  
ROSE REPORTING SPILL ON 10-7-83 & CLEANUP ACTIVITY

RECORD NUMBER 50  
10/12/83 CODE: LET ROSE O  
ROSE LETTER TO REPRESENTATIVE TOM COLEMAN,  
MISSOURI, MENTIONING SLOW REVIEW BY EPA AND USING  
THIS AS REASON TO EXTEND ONE-YEAR STORAGE.

RECORD NUMBER 51  
11/03/83 CODE: LET CONGRS  
LETTER FROM SENATOR EAGLETON SAYING ROSE IS  
CONCERNED ABOUT REVIEW TIME FRAME AND HE WOULD  
LIKE SOME INDICATION OF THE REVIEW PROCESS STEPS  
THAT MUST BE TAKEN.

RECORD NUMBER 52  
11/06/83 CODE: INSP EPA  
ROSE INSPECTION REPORT.

RECORD NUMBER 53  
11/07/83 CODE: APPROVAL  
COMMERCIAL APPROVAL FOR CAPACITORS (OCTOBER 15,  
1983 TO OCTOBER 15, 1986).

RECORD NUMBER 54  
11/07/83 CODE: MEETING  
MENTION 11/7 MEETING WITH MORRIS KAY.

RECORD NUMBER 55  
11/10/83 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING MODIFICATION TO  
CAPACITOR LINE (CUT CORE MATERIAL).

RECORD NUMBER 56  
11/14/83 CODE: APPLICATIN  
APPLICATION FOR MODIFICATION OF CAPACITOR APPROVAL  
(CORE MATERIAL PROCESSING).

RECORD NUMBER 57  
11/16/83 CODE: LET ROSE P  
LETTER FROM ROSE TO KAY REQUESTING VARIANCE TO ONE  
YEAR STORAGE REQUIREMENT

RECORD NUMBER 58  
11/30/83 CODE: LET CONGRS  
LETTER FROM HEADQUARTERS TO REPRESENTATIVE TOM  
COLEMAN, MISSOURI, EXPLAINING ONE-YEAR TIME PERIOD  
FOR DISPOSAL AND STATING WILL NOT INCREASE FOR  
DISPOSAL FACILITIES.

RECORD NUMBER 59  
12/02/83 CODE: LET CONG  
LETTER FROM MOORE(HQ) TO REP. THOMAS COLEMAN IN  
REGARD TO MCR'S REQUEST FOR VARIANCE OF ONE YEAR  
STORAGE REQUIREMENT.

RECORD NUMBER 60  
12/02/83 CODE: LET EPA D  
LETTER TO SENATOR EAGLETON, MISSOURI, IN RESPONSE  
TO NOVEMBER 3, 1983, INQUIRY ON BEHALF OF ROSE AS  
TO REASON TAKING SO LONG ON APPROVALS.

RECORD NUMBER 61  
12/05/83 CODE: LET CONG  
LETTER FROM IKE SKELTON TO KAY REQUESTING REVIEW  
OF MCR'S REQUEST FOR VARIANCE OF ONE YEAR STORAGE  
REQUIREMENT

RECORD NUMBER 62  
12/13/83 CODE: LET EPA C  
LETTER TO ROSE IN RESPONSE TO ROSE LETTER TO  
SENATOR THOMAS EAGLETON, MISSOURI, DATED 11-28-83  
REGARDING VARIANCE TO 1-YEAR DISPOSAL  
REQUIREMENTS.

RECORD NUMBER 63  
12/14/83 CODE: APPROVAL  
APPROVAL GRANTED FOR RESEARCH AND DEVELOPMENT (R &  
D) ON FIVE PCB CAPACITOR CORES. EFFECTIVE  
DECEMBER 15, 1983, UNTIL JUNE 16, 1984.

RECORD NUMBER 64  
12/14/83 CODE: LET EPA A  
LETTER TO ROSE FOR MODIFICATION TO CAPACITOR  
APPROVAL (CAPACITOR CORE CUTTING).

RECORD NUMBER 65  
12/14/83 CODE: MEMO EPA  
MEMO FROM DAVID WAGONER TO MORRIS KAY REQUESTING  
THAT APPROVAL BE GRANTED FOR A PROCESS CHANGE  
MAKING CAPACITOR CORES MORE AMENABLE TO  
INCINERATION.

RECORD NUMBER 66  
12/19/83 CODE: APPLICATION  
REQUEST FOR R&D APPROVAL OF GAS CONDENSATE  
PROCESS.

RECORD NUMBER 67  
12/28/83 CODE: LET CONG  
EPA LETTER TO REP. IKE SKELTON REGARDING ROSE  
REQUEST FOR VARIANCE FROM ONE YEAR STORAGE  
REQUIREMENT.

RECORD NUMBER 68  
12/29/83 CODE: LET ROSE A  
LETTER TO MORRIS KAY: ATTENTION STEVE BUSCH.  
RESPONSE TO CONDITION OF R & D APPROVAL TO REPORT  
PCB TRANSFORMERS PROCESSED SUMMARY OF PCB  
TRANSFORMERS PROCESSED - 9/1/83 - 12/31/83.

RECORD NUMBER 69  
01/10/84 CODE: LET ROSE A  
DWIGHT THOMAS'S LETTER TO EPA REQUESTING FORMAL  
APPROVAL TO BLEND OILS GREATER THAN 10,000 PPM  
PCBS FOR USE AS REACTOR FEED STOCK.



RECORD NUMBER 70  
01/10/84 CODE: LET ROSE A  
LETTER FROM MARTHA C. ROSE TO MORRIS KAY  
REQUESTING 80,000 - 90,000 LBS. OF CAPACITOR CORES  
BE AUTHORIZED FOR PROCESSING TO SCALE UP  
EQUIPMENT. THE 5 CORES AUTHORIZED IN THE R & D  
APPROVAL ARE NOT ADEQUATE.

RECORD NUMBER 71  
01/10/84 CODE: LET ROSE P  
ROSE LETTER TO EPA REQUESTING ABILITY TO BLEND  
DOWN HIGH PARTS PER MILLION (PPM) OIL TO PROCESS.

RECORD NUMBER 72  
01/24/84 CODE: LET EPA A  
LETTER TO ROSE IN RESPONSE TO JANUARY 10, 1984,  
LETTER. DENY ADDITIONAL 80,000 - 90,000 LBS. FOR  
CAPACITOR CORE R & D.

RECORD NUMBER 73  
01/30/84 CODE: LET ROSE A  
LETTER FROM DWIGHT THOMAS TO MORRIS KAY IN  
RESPONSE TO JANUARY 24, 1984, LETTER REQUESTING  
CHARACTERIZATION OF PROCESS STREAMS IN CAPACITOR  
CORE PROCESS.

RECORD NUMBER 74  
02/01/84 CODE: APPLICATION  
REQUEST FOR INTERIM APPROVAL TO PROCESS PCB  
TRANSFORMERS.

RECORD NUMBER 75  
02/02/84 CODE: LET EPA A  
EPA LETTER TO MARTHA C. ROSE SENDING APPENDIX FROM  
EPA CONTRACTOR DRAFT REPORT. INFORMATION TO HELP  
THEIR TRANSFORMER/CAPACITOR OPERATIONS.

RECORD NUMBER 76  
02/14/84 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING REVIEW STATUS OF THE  
GAS CONDENSATE APPLICATION, CAPACITOR CORES, AND  
PCB TRANSFORMERS

RECORD NUMBER 77  
02/17/84 CODE: LET ROSE A  
ROSE LETTER TO MORRIS KAY COMPLAINING ABOUT SLOW  
REVIEW, REQUESTING ADDITIONAL CAPACITOR MATERIAL  
FOR R AND D

RECORD NUMBER 78  
02/23/84 CODE: LET EPA A  
EPA LETTER TO ROSE GIVING ESTIMATED DATES FOR  
REVIEW COMPLETION ON GAS CONDENSATE, CAPACITOR  
CORE, AND PCB TRANSFORMER APPLICATIONS (REFERENCE  
ROSE LETTER OF FEBRUARY 14, 1984).

RECORD NUMBER 79  
03/06/84 CODE: MEETING  
HFR NOTES.

RECORD NUMBER 80  
03/16/84 CODE: MEMO EPA  
MEMO FROM DAVID WAGONER TO MORRIS KAY RECOMMENDING  
ROSE'S CAPACITOR CORE REDUCTION R & D BE DENIED.

RECORD NUMBER 81  
03/16/84 CODE: LET  
MDNR LETTER, POLICE REPORT.

RECORD NUMBER 82  
03/20/84 CODE: LET EPA A  
EPA LETTER FROM MORRIS KAY TO MARTHA C. ROSE  
GIVING ESTIMATES OF COMPLETION DATES FOR REVIEW OF  
GAS CONDENSATES, PCB TRANSFORMER, CAPACITOR CORE  
APPLICATIONS (REFERENCE ROSE LETTER OF FEBRUARY  
17, 1984). AUTHORIZED ADDITIONAL 80,000 LBS. FOR  
CAPACITOR CORE R&D.

RECORD NUMBER 83  
03/26/84 CODE: CIVIL EPA  
EPA ISSUED AN ADMINISTRATIVE CIVIL COMPLAINT BASED  
ON THE NOVEMBER 3 AND 4, 1983, INSPECTION OF  
ROSE'S FACILITY IN HOLDEN, FOR A PENALTY OF  
\$30,000 BECAUSE OF IMPROPER STORAGE OF PCBs (NO  
SPCC PLAN) AND HAD FAILED TO CURB THE STORAGE  
AREA.

RECORD NUMBER 84  
03/28/84 CODE: LET EPA A  
AN UNSIGNED, UNDATED LETTER (PINK COPY IN FILE)  
TYPED ON MARCH 28, 1984, CHANGING QUANTITY OF  
CORES MATERIAL AUTHORIZED TO PROCESS IN THE MARCH  
20, 1984, LETTER FROM MORRIS KAY TO MARTHA C. ROSE  
FROM 80,000 LBS. TO 8,000 LBS. ALSO REQUESTED  
ADDITIONAL INFORMATION.

RECORD NUMBER 85  
04/03/84 CODE: LET EPA A  
COMMENT LETTER FROM DAVID WAGONER TO ROSE  
DESCRIBING DEFICIENCIES IN DECEMBER 14, 1983, R &  
D REQUEST TO PROCESS PCB GAS CONDENSATE (PROCESS  
ORIGINALLY PROPOSED 12/14/82).

RECORD NUMBER 86

04/11/84 CODE: MEETING

SETTLEMENT CONFERENCE BETWEEN ROSE AND EPA [ROMPAGE AND FRYE] ON VII-84-T-181. ROSE NOW HAS INCINERATION CONTRACTS AND A HEADQUARTERS RECLASSIFICATION APPROVAL. WITH THOSE THEY CAN GET INTO COMPLIANCE IN SIX MONTHS WITH ONE YEAR REQUIREMENT. REVIEWED MARKING AND SPCC VIOLATION. ROSE AGREED TO FENCE THE AREA. VERBAL AGREEMENT ON TERMS OF SETTLEMENT.

RECORD NUMBER 87

04/19/84 CODE: LET EPA A

LETTER TO WALTER CAROLAN REFUSING REQUEST FOR INTERIM APPROVAL TO PROCESS PCB TRANSFORMERS.

RECORD NUMBER 88

04/19/84 CODE: LET OTHER

BROOKLYN GAS LETTER.

RECORD NUMBER 89

04/25/84 CODE: APPLICATIN

REQUEST FOR INTERIM APPROVAL TO PROCESS PCB TRANSFORMERS.

RECORD NUMBER 90

04/26/84 CODE: LET ROSE

LETTER TO BROOKLYN GAS.

RECORD NUMBER 91

05/02/84 CODE: LET OTHER

BROOKLYN GAS.

RECORD NUMBER 92

05/17/84 CODE: CIVIL

ROSE'S ANSWER TO DOCKET NO. VII-84-T-181.

RECORD NUMBER 93

05/17/84 CODE: LET EPA A

LETTER FROM LYNN HARRINGTON TO MARTHA C. ROSE DESCRIBING INFORMATION TO BE INCLUDED IN A COMMERCIAL APPROVAL REQUEST.

RECORD NUMBER 94

05/17/84 CODE: LET EPA C

CAROLAN LETTER TO REGIONAL HEARING CLERK ENCLOSING ANSWER AND REQUEST FOR HEARING ON VII-84-T-181.

RECORD NUMBER 95

05/18/84 CODE: LET EPA C

REGIONAL HEARING CLERK TO CHIEF ALJ FINCH ENCLOSING COPY OF ANSWER AND REQUEST FOR HEARING, VII-84-T-181.

RECORD NUMBER 96  
05/18/84 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING SIX-MONTH EXTENSION  
TO R AND D

RECORD NUMBER 97  
05/30/84 CODE: LET EPA C  
HEADQUARTERS CONCURS ON REDUCTION OF PENALTY  
GREATER THAN 40 PERCENT, VII-84-T-181.

RECORD NUMBER 98  
06/11/84 CODE: LET EPA C  
LETTER FROM HENRY ROMPAGE TO W. CAROLAN, ENCLOSING  
COPY OF CONSENT AGREEMENT. CONSENT AGREEMENT  
CONTAINS SETTLEMENT WITH CONDITIONS FOR PCB ITEMS  
STORED MORE THAN ONE YEAR.

RECORD NUMBER 99  
06/22/84 CODE: LET EPA C  
W. CAROLAN TO REGIONAL HEARING CLERK, ENCLOSING  
EXECUTED CONSENT AGREEMENT, VII-84-T-181 WITH  
PAYMENT OF \$7,000.

RECORD NUMBER 100  
06/25/84 CODE: LET ROSE  
ROSE LETTER TO EPA.

RECORD NUMBER 101  
06/26/84 CODE: LET EPA C  
ROMPAGE TO ALJ JONES RE CONSENT AGREEMENT MAILED  
TO RESPONDENT ON 6/24/84.

RECORD NUMBER 102  
07/02/84 CODE: CONSENT  
CONSENT AGREEMENT BETWEEN ROSE AND EPA SETTLING  
DOCKET NO. VII-84-T-181. RESPONDENT AGREED TO PAY  
\$7,000 IMMEDIATELY AND THE REMAINDER IF HE FAILED  
TO PROPERLY DISPOSE OF PCB CAPACITOR CORE MATERIAL  
BY 5/15/84, ALL PCB TRANSFORMERS SUBJECT TO THE  
1/1/84 DATE BY 8/31/84 AND DOCUMENT BY 9/5/84.

RECORD NUMBER 103  
07/02/84 CODE: APPROVAL  
APPROVAL TO PROCESS PCB TRANSFORMERS. EFFECTIVE  
JULY 1, 1984, TO JULY 1, 1987.

RECORD NUMBER 104  
07/03/84 CODE: LET ROSE A  
LETTER TO MORRIS, 30-DAY ADVANCE NOTIFICATION OF  
ROSE'S INTENT TO BEGIN PCB TRANSFORMER PROCESSING.

RECORD NUMBER 105  
07/12/84 CODE: LET ROSE A  
LETTER TO EPA FROM WALTER CAROLAN, MARTHA C. ROSE  
CHEMICAL COMPANY, REQUESTING A MEETING WITH EPA  
REGARDING APPROVAL FOR CAPACITOR CORES. EXPRESSED  
CONCERN THAT THE DEPARTURE OF STEVE BUSCH WILL  
SLOW REVIEW OF THEIR APPLICATION.

RECORD NUMBER 106  
07/24/84 CODE: LET OTHER  
ROLLINS LETTER.

RECORD NUMBER 107  
08/01/84 CODE: EPA LET A  
EPA LETTER TO ROSE IN RESPONSE TO JULY 12, 1984,  
LETTER. DENY 6-MONTH EXTENSION FOR R AND D  
CAPACITOR CORE REDUCTION.

RECORD NUMBER 108  
08/01/84 CODE: MEMO EPA  
MEMO FROM DAVID WAGONER TO MORRIS KAY REGARDING  
6-MONTH EXTENSION FOR DECEMBER 14, 1983, R & D  
APPROVAL TO PROCESS CAPACITOR CORES. THIS MEMO  
REQUESTS THE EXTENSION BE DENIED.

RECORD NUMBER 109  
08/03/84 CODE: LET OTHER  
BROOKLYN GAS.

RECORD NUMBER 110  
08/07/84 CODE: INSP EPA  
INSPECTION OF ROSE BY TOPE. FOUND IMPROPER  
STORAGE, MARKING, RECORDKEEPING AND DISPOSAL.  
FOUND VIOLATIONS OF ALL THREE DISPOSAL APPROVALS.  
ALSO FOUND VIOLATIONS ON CONSENT AGREEMENT FOR  
VII-84-T-181.

RECORD NUMBER 111  
08/13/84 CODE: LET OTHER  
BROOKLYN GAS.

RECORD NUMBER 112  
08/24/84 CODE: LET ROSE A  
LETTER REFERENCING 08/22/84 MEETING WITH FLEER  
REQUESTING MODIFICATION OF CAPACITOR LINE AND OIL  
DETOX LINE

RECORD NUMBER 113  
08/30/84 CODE: LET EPA A  
EPA LETTER TO ROSE STATING MAY NOT BLEND DOWN HIGH  
CONCENTRATION OF PCB OIL SO IT CAN BE PROCESSED.

RECORD NUMBER 114  
08/31/84 CODE: LET ROSE C  
LETTER TO EPA FROM ROSE TO DOCUMENT COMPLIANCE  
WITH VII-84-T-181.

RECORD NUMBER 115  
09/07/84 CODE: LET ROSE C  
ROSE LETTER TO EPA WITH REVISED RECORDKEEPING  
FORMS AS DISCUSSED ON SEPTEMBER 5, 1984.

RECORD NUMBER 116  
10/04/84 CODE: INSP  
LABORATORY RESULTS FROM NEIC CONCERNING AUGUST  
1984 7 EPA INSPECTION (NOTE: TEN OF ELEVEN  
SAMPLES CONTAINED PCBS). ANALYSIS ON 10/11/84

RECORD NUMBER 117  
10/09/84 CODE: LET ROSE A  
LETTER TO EPA FROM MARTHA C. ROSE DESCRIBING THE  
PCB REACTOR PLATFORM AND RELOCATION OF MAIN PUMPS.

RECORD NUMBER 118  
10/10/84 CODE: MEMO EPA C  
DAVID WAGONER TO DAVID TRIPP, INFORMING THAT ROSE  
FAILED TO COMPLY WITH TERMS OF CONSENT AGREEMENT,  
REQUEST ACTION BE INITIATED TO COLLECTED REMAINDER  
OF PENALTY. ATTACHED REVIEWS OF PCB CAPACITOR AND  
TRANSFORMER VIOLATIONS.

RECORD NUMBER 119  
10/12/84 CODE: LET EPA A  
LETTER TO MARTHA C. ROSE FROM MORRIS KAY, EPA  
REGION VII REGIONAL ADMINISTRATOR, MODIFYING  
CONDITION 9H OF MARCH 15, 1983, APPROVAL. IF WASTE  
FROM PROCESS HAS pH OF 12.5 OR GREATER IT IS  
CONSIDERED RCRA WASTE.

RECORD NUMBER 120  
10/15/84 CODE: INSP EPA  
CRIMINAL INVESTIGATION OF ROSE EMPLOYEES, DATA  
ENFORCEMENT SENSITIVE.

RECORD NUMBER 121  
10/18/84 CODE: CIVIL  
LETTER TO ROSE STATING THAT THE CONSENT ORDER FOR  
VII-84-T-181 WAS VIOLATED. ASKING PAYMENT OF  
\$23,000 REMAINING OF THE \$30,000 PENALTY  
ORIGINALLY ASSESSED.

RECORD NUMBER 122  
10/26/84 CODE: LET EPA C  
ROMPAGE TO W. CAROLAN, GRANTED 15-DAY POSTPONEMENT  
IN PAYMENT OF CIVIL PENALTY, AND SET MEETING FOR  
NOVEMBER 1, 1984, RE EPA'S POSITION ON CHARGES.

RECORD NUMBER 123  
11/02/84 CODE: LET ROSE C  
ROSE'S LETTER TO HENRY ROMPAGE REFERENCING MEETING  
OF 11/1/84 CONCERNING VIOLATION OF FIRST CONSENT  
AGREEMENT.

RECORD NUMBER 124  
11/02/84 CODE: LET EPA C  
HENRY ROMPAGE TO WALTER CAROLAN, RE 11-1-84  
MEETING ON COMPLIANCE WITH FINAL ORDER. AFFIRMS  
EPA'S POSITION THAT REMAINDER OF PENALTY (\$23,000)  
IS DUE AND PAYABLE BY NOVEMBER 13, 1984.

RECORD NUMBER 125  
11/06/84 CODE: INSP EPA  
INTERVIEW WITH ROSE EMPLOYEE NO 1 DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 126  
11/06/84 CODE: INSP EPA  
INTERVIEW WITH ROSE EMPLOYEE DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 127  
11/11/84 CODE: APPLICATION  
REQUEST FOR INTERIM APPROVAL TO PROCESS PCB  
TRANSFORMERS.

RECORD NUMBER 128  
11/12/84 CODE: LET ROSE C  
WALTER CAROLAN'S MOTION FOR APPEAL AND REQUEST FOR  
HEARING BEFORE THE ADMINISTRATIVE LAW JUDGE, RE  
TSCA DOCKET VII-84-T-181.

RECORD NUMBER 129  
11/30/84 CODE: LET EPA C  
COMPLAINANT'S RESPONSE IN OPPOSITION TO  
RESPONDENT'S MOTION FOR APPEAL AND REQUEST FOR A  
HEARING BEFORE THE ADMINISTRATIVE LAW JUDGE.

RECORD NUMBER 130  
12/05/84 CODE: PHONE OTHR  
BADGER REPORTING IMPROPER STORAGE OF CAPACITOR  
CORES TO DIANE MOLINE, TOPE.

RECORD NUMBER 131  
12/12/84 CODE: LET EPA C  
MORRIS KAY DENIES ROSE'S REQUEST TO REOPEN TSCA  
DOCKET VII-84-T-181 AFTER CASE CLOSURE.

RECORD NUMBER 132  
12/24/84 CODE: CONSENT  
RECEIVED 23,000 CHECK FROM ROSE.

RECORD NUMBER 133  
01/03/85 CODE: LET EPA A  
LETTER FROM EPA TO MARTHA C. ROSE REQUESTING  
ADDITIONAL INFORMATION ON TYPES OF MATERIAL TO BE  
PROCESSED, QA/QC, DISASSEMBLY AND SAMPLING FOR THE  
TRANSFORMER PROCESSING APPLICATION.

RECORD NUMBER 134  
01/03/85 CODE: LET EPA C  
MEMORANDUM FROM HENRY ROMPAGE TO MORRIS KAY  
REGARDING COMPLAINT VII-84-T-181. RESPONDENT  
SUBMITTED REMAINDER OF CIVIL PENALTY OF \$23,000.  
CASE CLOSED.

RECORD NUMBER 135  
01/03/85 CODE: PHONE  
TCR ON BROOKLYN GAS.

RECORD NUMBER 136  
01/04/85 CODE: LET ROSE A  
ROSE LETTER TO MORRIS REQUESTING REVIEW STATUS OF  
(1) RECORDKEEPING UPDATE (SEPTEMBER 7, 1984); (2)  
CLEANING OF DRUMS TOOLS, MISC. METAL (NOVEMBER 14,  
1984); (3) DECONTAMINATION OF ELECTRICAL EQUIPMENT  
(NOVEMBER 14, 1984); AND BLENDING OF OIL (DECEMBER  
6, 1984 TO HQ, DECEMBER 21, 1984 TO REGION VII).

RECORD NUMBER 137  
01/07/85 CODE: APPLICATIN  
RESUBMITTED REQUEST FOR INTERIM APPROVAL TO  
DISPOSE OF PCB TRANSFORMERS.

RECORD NUMBER 138  
01/07/85 CODE: LET HQ P  
LETTER FROM HEADQUARTERS TO ROSE DENYING APPROVAL  
TO BLEND DOWN HIGH PARTS PER MILLION OIL TO  
PROCESS.

RECORD NUMBER 139  
02/04/85 CODE: LET EPA A  
RESPONCE TO ROSE 1/4/85 LETTER GIVING REVIEW  
STATUS AND COMMENTS ON RECORDKEEPING FORMS



RECORD NUMBER 140  
02/20/85 CODE: LET EPA A  
LETTER TO MARTHA C. ROSE FROM EPA STATING  
DEFICIENCIES IN DECEMBER 21, 1984, REQUEST TO  
BLEND PCB OIL WITH PROCESSED OIL.

RECORD NUMBER 141  
02/25/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO IOWA PUBLIC SERVICE  
COMPANY, SIOUX CITY, IOWA, ENCLOSING COPIES OF  
COMPLAINTS VII-84-T-181, ISSUED TO ROSE, AND  
VII-84-T-317, ISSUED TO PCB DISPOSAL SYSTEMS, INC.

RECORD NUMBER 142  
02/25/85 CODE: CIVIL  
EPA REGION VII ISSUED A CIVIL PENALTY OF \$176,250  
FOR NINE COUNTS OF VIOLATIONS TO PCB RULE. THEY  
WERE IMPROPER STORAGE, MARKING, RECORDKEEPING, AND  
DISPOSAL (INCLUDING VIOLATIONS OF CAPACITOR,  
TRANSFORMER AND OIL TREATMENT APPROVALS).

RECORD NUMBER 143  
03/11/85 CODE: SETTLEMENT  
DWIGHT THOMAS TO HENRY ROMPAGE, REQUESTING  
INFORMAL SETTLEMENT CONFERENCE, VII-84-T-331.

RECORD NUMBER 144  
03/12/85 CODE: LET OTHER  
REQUEST FOR COPY OF COMPLAINT VII-84-T-331 BY PCB  
DISPOSAL SYSTEMS, INC.

RECORD NUMBER 145  
03/12/85 CODE: LET OTHER  
REQUEST BY SOUTHWESTERN ELECTRIC POWER CO.,  
SHREVEPORT, LA, FOR COPY OF COMPLAINT AGAINST  
ROSE, VII-84-T-331.

RECORD NUMBER 146  
03/14/85 CODE: LET OTHER  
REGIONAL HEARING CLERK ENCLOSURES COPY OF COMPLAINT,  
VII-84-T-331, TO PCB DISPOSAL SYSTEMS, INC.

RECORD NUMBER 147  
03/15/85 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSURES COPY OF COMPLAINT,  
VII-84-T-331, TO KLUCKITAT, PUD, GOLDENDALE,  
WASHINGTON.

RECORD NUMBER 148  
03/15/85 CODE: ANSWER  
ROSE 14 PAGE ANSWER AND REQUEST FOR HEARING  
VII-84-T-331.

RECORD NUMBER 149  
03/15/85 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSES COPY OF COMPLAINT,  
VII-84-T-331, TO SOUTHWESTERN ELECTRIC POWER CO.,  
SHREVEPORT, LA.

RECORD NUMBER 150  
03/26/85 CODE: LET ROSE A  
LETTER TO EPA REGARDING MODIFICATION TO MARCH 10,  
1983, APPROVAL FOR ROSE'S OIL PROCESSING.

RECORD NUMBER 151  
03/27/85 CODE: SETTLEMENT  
ROMPAGE, PETRUSKA, MC CULLERS, SMITHSON, THOMAS  
(AND OTHERS). SETTLEMENT NEGOTIATION SESSION,  
VII-84-T-331. REVIEWED LIST OF VIOLATIONS.

RECORD NUMBER 152  
03/29/85 CODE: LET EPA A  
LETTER TO WALT CAROLAN REFUSING MODIFICATION OF  
APPROVAL AS REQUESTED BY ROSE, JANUARY 7, 1985.

RECORD NUMBER 153  
03/30/85 CODE: LET ROSE C  
J. CAROLAN TO SMITHSON, RE TAX RETURNS FOR PERIOD  
8/31/84. RECEIVED EXTENSION OF TIME FOR FILING,  
FINAL SUBMISSION TO BE 5/15/85. ANTICIPATE GROSS  
RECEIPTS TO BE \$2,335,000 (SHAREHOLDERS IDENTIFIED  
AS GERALD JESPERSON, WICHITA, KS; AND WALTER C.  
CAROLAN, MISSION HILLS, KS).

RECORD NUMBER 154  
04/12/85 CODE: SETTLEMENT  
SETTLEMENT CONFERENCE (VII-84-T-181). ROMPAGE,  
GEORGE BANG, JIM FLEER, MC CULLERS, SMITHSON,  
CAROLAN, D. THOMAS. ROSE TALKED ABOUT WASTE TECH,  
INCINERATOR FINANCED BY BECHTEL. ROSE WOULD NEED  
TO INVEST \$100K IMMEDIATELY, AND IN JULY START  
SITE IMPROVEMENTS OF \$200K. AGREEMENT TO USE 4% OF  
SALES TO CALCULATE PENALTY.

RECORD NUMBER 155  
04/19/85 CODE: LET OTHER  
NEW ENGLAND POWER SERVICE COMPANY REQUESTS COPIES  
OF CIVIL COMPLAINTS FILED AGAINST MARTHA C. ROSE.

RECORD NUMBER 156  
04/22/85 CODE: SETTLEMENT  
SETTLEMENT CONFERENCE. HENRY ROMPAGE, RUBEN MC  
CULLERS, TONY PETRUSKA, W & J CAROLAN, DWIGHT  
THOMAS, SMITHSON. DISCUSSED FINANCIAL STATUS,  
NEGATIVE NET WORTH. DISCUSSED CESSATION OF NEW  
INVENTORY, HOW PENALTY WAS DERIVED (VII-84-T-181).

RECORD NUMBER 157  
04/22/85 CODE: SETTLEMENT  
ACTUAL DATE ON DOCUMENT IS 4/85. MARTHA C. ROSE  
FINANCIAL STATEMENTS FOR AUGUST 31, 1982 AND 1983.

RECORD NUMBER 158  
04/22/85 CODE: SETTLEMENT  
ACTUAL DATE ON DOCUMENT IS 4/85. DISCUSSION NOTES  
FOR ROSE MITIGATION.

RECORD NUMBER 159  
04/23/85 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSES COPY OF CIVIL  
ACTIONS VII-84-T-181 AND VII-84-T-331 TO NEW  
ENGLAND POWER SERVICE COMPANY, WESBOROUGH,  
MASSACHUSETTS.

RECORD NUMBER 160  
04/24/85 CODE: LET ROSE C  
SMITHSON ENCLOSED FINANCIAL STATEMENTS FOR ROSE  
FOR YEAR ENDED AUGUST 31, 1984, AND COPY OF  
FEDERAL INCOME TAX RETURNS.

RECORD NUMBER 161  
04/25/85 CODE: LET OTHER  
MARINE POLLUTION CONTROL, DETROIT, MICHIGAN,  
REQUESTS COPIES OF ALL CIVIL ACTIONS FILED AGAINST  
MARTHA C. ROSE.

RECORD NUMBER 162  
04/26/85 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSES COPY OF CIVIL  
ACTIONS VII-84-T-181 AND VII-84-T-331 TO MARINE  
POLLUTION CONTROL, DETROIT, MICHIGAN.

RECORD NUMBER 163  
05/09/85 CODE: PHONE MAYR  
MAYOR VOICING CONCERN ON INCINERATORY FACILITY AT  
HOLDEN. SAID HE HAD SEVERAL EMPLOYEES OF ROSE WHO  
WOULD BE WILLING TO TALK TO EPA INVESTIGATORS.

RECORD NUMBER 164  
05/10/85 CODE: TCR EPA H  
SUMMARY OF PHONE CONVERSATION WITH MAYOR  
BRILLHART, HOLDEN, REGARDING PROBLEMS WITH ROSE.

RECORD NUMBER 165  
05/16/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE NO. 2. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 166  
05/16/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE NO. 1. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 167  
05/21/85 CODE: LET ROSE C  
SMITHSON PROVIDES SUMMARY OF ROSE PURCHASES FOR  
FISCAL PERIOD AUGUST 31, 1984; INCLUDES  
DETOXIFICATION EXPENSES OF TECHNICAL AND  
NONTECHNICAL SERVICES, COMMUNICATION,  
SUBCONTRACTS, TRANSPORTATION, MATERIALS, SPACE.  
TOTAL \$2,020,003.

RECORD NUMBER 168  
05/30/85 CODE: INSP EPA  
INTERVIEW WITH ROSE EMPLOYEE. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 169  
06/03/85 CODE: LET ROSE C  
SMITHSON TO HENRY ROMPAGE, EPA, CONFIRMING  
AGREEMENT TO CONTINUE PRE-EXISTING ORDERS TO JULY  
10, 1985.

RECORD NUMBER 170  
06/04/85 CODE: LET EPA C  
HENRY ROMPAGE TO ALJ JONES REQUESTING EXTENSION  
FOR FILING PREHEARING EXCHANGE, SINCE COMPLICATED  
MATTERS ARE INVOLVED AND DISCUSSIONS ARE TIME  
CONSUMING.

RECORD NUMBER 171  
06/10/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 172  
06/13/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE NO. 1. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 173  
06/13/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE NO. 2. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 174  
06/13/85 CODE: INSP OSHA  
OSHA REFERRAL REPORT AND NOTIFICATION OF PENALTY  
RESULTING FROM 5/31 - 6/7/85 OSHA INSPECTION.  
\$1,000 PENALTY.

RECORD NUMBER 175  
06/19/85 CODE: SETTLEMENT  
SETTLEMENT CONFERENCE, VII-84-T-181. DISCUSSED  
SETTLEMENT WITH CONDITIONS. DISCUSSED TIME FRAME  
FOR 4% REDUCTION

RECORD NUMBER 176  
06/24/85 CODE: SETTLEMENT  
SETTLEMENT CONFERENCE ON TSCA DOCKET VII-84-T-331.  
ATTENDEES OF CONFERENCE WERE HENRY ROMPAGE,  
WOLFGANG BRANDER, ANTHONY PETRUSKA, RUBEN MC  
CULLERS (ALL OF EPA); AND DWIGHT THOMAS, SMITHSON,  
REPRESENTING MARTHA C. ROSE CHEMICAL CO. AGREEMENT  
IN PRINCIPAL TO SETTLE THE CASE PER NEGOTIABLE  
CONDITIONS.

RECORD NUMBER 177  
06/27/85 CODE: LET ROSE C  
SMITHSON TO ADMINISTRATIVE LAW JUDGE JONES THAT  
AGREEMENT REACHED IN SETTLEMENT OF TSCA DOCKET NO.  
VII-84-T-331.

RECORD NUMBER 178  
07/01/85 CODE: LET ROSE  
UNDATED ROSE LETTER WITH FINANCIAL STATEMENT FOR  
PERIOD OF 8/31/82 THROUGH 8/31/83. DATE  
APPROXIMATE.

RECORD NUMBER 179  
07/01/85 CODE: LET EPA A  
KAY LETTER INDICATING NEED TO COVER CLOSURE COST  
AND LIABILITY INSURANCE

RECORD NUMBER 180  
07/01/85 CODE: MEETING  
HENRY ROMPAGE, GEORGE BANG, RUBEN MC CULLERS, TONY  
PETRUSKA - EPA; AND SMITHSON, DWIGHT THOMAS, AND  
CAROLAN - ROSE -- BANG PARTICIPATED SINCE HE WILL  
BE REVIEWING PERMIT REVISIONS. PERMITS WILL BE  
REVISED TO RUN FOR THREE YEARS.

CONDITION OF CONSENT AGREEMENT AND FINAL ORDER TO  
SUBMIT ALL INFORMATION BY DATE CERTAIN. DISCUSSED  
PERMIT REQUIREMENTS.

RECORD NUMBER 181

07/01/85 CODE: MEETING

RECORD OF COMMUNICATION ON MEETING WITH ROSE IN  
SETTLING ROSE'S COMPLIANCE PROBLEMS. MEETING WAS  
ATTENDED BY WALTER CAROLAN, DWIGHT THOMAS, AN  
ATTORNEY FOR ROSE, RUBEN MC CULLERS, TONY  
PETRUSKA, HENRY ROMPAGE, AND GEORGE BANG.  
DISCUSSION WAS OF SPECIFIC REQUIRMENT BEING PLACED  
BY EPA ON ROSE, VIA THE SETTLEMENT

RECORD NUMBER 182

07/02/85 CODE: PHONE MAYR

MAYOR BRILLHART CALLED TO REPORT ROSE ACCIDENT AND  
VIOLATIONS.

RECORD NUMBER 183

07/10/85 CODE: LET EPA O

UNDATED LETTER TO MAYOR TRANSMITTING 7/1/85  
LETTER.

RECORD NUMBER 184

07/11/85 CODE: LET OTHER

REQUEST FROM SCHIEFF, HARDIN AND WAITE, FOR COPIES  
OF ALL DOCUMENTS FILED IN TSCA DOCKET  
VII-84-T-331.

RECORD NUMBER 185

07/15/85 CODE: LET EPA C

REQUEST FOR CONCURRENCE IN REDUCING PENALTY  
GREATER THAN 40 PERCENT, VII-84-T-331.

RECORD NUMBER 186

07/15/85 CODE: LET EPA A

LETTER FROM EPA TO DWIGHT THOMAS, ROSE, ENCLOSING  
DESIGN SPEC SHEETS FOR TANK AND SOLVENT GREASERS.  
SPECS WERE REQUIRED AS PART OF NEW PCB DISPOSAL  
APPLICATION PACKAGE IN REGION VII.

RECORD NUMBER 187

07/17/85 CODE: LET EPA C

REGIONAL HEARING CLERK TO SCHIFF, HARDIN AND  
WAITE, CHICAGO, IL., ENCLOSING COPIES OF ALL  
DOCUMENTS FILED REGARDING VII-84-T-331.

RECORD NUMBER 188

07/19/85 CODE: CNP OSHA R

CITATION AND NOTIFICATION OF PENALTY BY OSHA FOR  
\$810, SIGNED BY JOHN O. SCHILTZ.

RECORD NUMBER 189  
07/22/85 CODE: LET EPA C  
SIGNED CONCURRENCE TO REDUCE PENALTY GREATER THAN  
40 PERCENT, VII-84-T-331.

RECORD NUMBER 190  
07/23/85 CODE: LET SKLT C  
CONTROLLED CONGRESSIONAL FROM IKE SKELTON  
REQUESTING INFORMATION ON INCINERATION OF PCBs ON  
BEHALF OF MAYOR BRILLHART, HOLDEN, MISSOURI.

RECORD NUMBER 191  
07/23/85 CODE: TCR EPA P  
RECORD OF COMMUNICATION PREPARED BY MIKE WOLFRAM,  
RCRA, CONCERNING "BACKGROUND OF PCB  
IMPLEMENTATION." REQUESTED LIST OF LABS THAT  
7/1/85 LETTER REQUIRING FINANCIAL ASSURANCE.

RECORD NUMBER 192  
07/25/85 CODE: PHONE MAYR  
MAYOR BRILLHART REPORTING VIOLATIONS AT ROSE BY  
EMPLOYEES DILUTING PCBs, CHANGING LABELS.

RECORD NUMBER 193  
07/30/85 CODE: INSP OSHA  
OSHA CITATION AND NOTIFICATION OF PEMAITY FOR  
INSPECTIONS DATED 1-24-85 AND 6-21-85

RECORD NUMBER 194  
08/01/85 CODE: LET CONG  
EPA LETTER TO REP. IKE SKELTON ON THE INCINERATION  
OF PCBs IN RESPONSE TO MAYOR BRILLHART'S REQUEST

RECORD NUMBER 195  
08/02/85 CODE: LET ROSE C  
SMITHSON TO ALJ JONES, REGARDING STATUS OF  
SETTLING VII-84-T-331, "REASONABLE PROGRESS IS  
BEING MADE."

RECORD NUMBER 196  
08/06/85 CODE: PHONE MAYR  
MAYOR VOICING CONCERN THAT TOPS OF TRANSFORMERS  
BEING REMOVED WITH CUTTING TORCH AND PCB BEING  
BURNED AT NIGHT.

RECORD NUMBER 197  
08/09/85 CODE: LET ROSE F  
LETTER FROM ROSE'S ATTORNEY RE MORRIS KAY'S LETTER  
OF 7/1/85 PERTAINING TO FINANCIAL ASSURANCE  
DOCUMENTATION.

RECORD NUMBER 198  
08/23/85 CODE: MEMO MDNR  
DEPARTMENT OF ENVIRONMENTAL QUALITY MEMO TO  
BRUNNER  
(MDNR) ON COMPLAINTS TO LT. GOV. HARRIET WOODS,  
MISSOURI, FROM MAYOR BRILLHART CONCERNING ROSE.

RECORD NUMBER 199  
08/26/85 CODE: LET EPA D  
LETTER FROM EPA TO WOLFGANG SCHMIDT (SPENCER,  
FANE, BRITT, AND BROWNE) RE FINANCIAL REQUIREMENTS  
FOR PCB DISPOSAL FACILITIES.

RECORD NUMBER 200  
08/27/85 CODE: LET EPA T  
LETTER FROM EPA TO DWIGHT THOMAS, MCR - HOLDEN,  
REGARDING TEST RESULTS OF TRANSFORMER PROCESS  
DEMONSTRATION OF APRIL 17, 1985.

RECORD NUMBER 201  
09/10/85 CODE: LET EPA C  
ROMPAGE TO SMITHSON, ENCLOSING CONSENT AGREEMENT  
AND FINAL ORDER, VII-84-T-331, AND AFFIRMING  
PENALTY OF \$46,000, WITH \$10,000 TO BE PAID  
IMMEDIATELY AND BALANCE DEFERRED.

RECORD NUMBER 202  
09/17/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO ROSE ATTORNEY, SENDING  
TWO COPIES, ORIGINAL SIGNATURES, OF CONSENT  
AGREEMENT AND FINAL ORDER, RE TSCA DOCKET NO.  
VII-84-T-331.

RECORD NUMBER 203  
09/18/85 CODE: LET ROSE C  
SMITHSON TO ROMPAGE, ENCLOSING RETYPED DRAFT OF  
CONSENT AGREEMENT, VII-84-T-331, WITH CHANGES  
PURPORTEDLY AGREED WITH CNSL.

RECORD NUMBER 204  
09/20/85 CODE: INSP MDNR  
INTERVIEW OF ROSE EMPLOYEES CONCERNING ACTIVITIES  
AT ROSE. DATA ENFORCEMENT SENSITIVE.

RECORD NUMBER 205  
09/23/85 CODE: INSP EPA  
INSPECTION OF RIG INDUSTRIES OF KANSAS CITY,  
MISSOURI, TO SAMPLE METAL THAT ALLEGEDLY WAS FROM  
ROSE.



RECORD NUMBER 206  
09/24/85 CODE: MEETING  
LEO ALDERMAN PARTICIPATED IN MEETING WITH  
COMMUNITY. REQUESTED BY STATES TO ATTEND.  
SUBJECT: MARTHA C. ROSE CHEMICAL CO.

RECORD NUMBER 207  
09/29/85 CODE: INSP MDNR  
MISSOURI DEPARTMENT OF NATURAL RESOURCES  
INSPECTION REPORT ON THEIR INSPECTION OF ROSE.

RECORD NUMBER 208  
09/29/85 CODE: PPR EPA R  
NEWSPAPER ARTICLE FROM KANSAS CITY STAR RE MCR'S  
DESIRE TO BRING AN INCINERATOR TO HOLDEN,  
MISSOURI.

RECORD NUMBER 209  
09/30/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO CHRIS RICE, PPM,  
ENCLOSING COPY OF CONSENT AGREEMENT RE  
VII-84-T-331.

RECORD NUMBER 210  
09/30/85 CODE: LET MDNR  
MDNR'S LETTER TO MAYOR BRILLHART DISCUSSING MDNR'S  
INSPECTION OF HOLDEN, MISSOURI, AND PROVIDING  
COPIES OF MDNR'S SAMPLE ANALYSIS RESULTS COLLECTED  
9/18/85.

RECORD NUMBER 211  
09/30/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO ROSE ATTORNEY, ENCLOSING  
COPY OF CONSENT AGREEMENT RE TSCA DOCKET  
VII-84-T-331.

RECORD NUMBER 212  
10/01/85 CODE: LET MDNR  
MDNR LETTER TO ROSE DISCUSSING RESULTS OF THE  
9/18/85 MDNR INSPECTION AND ADVISING ROSE OF  
MDNR'S WATER QUALITY STANDARDS.

RECORD NUMBER 213  
10/10/85 CODE: INSP EPA  
SAMPLE ANALYSIS RESULTS OF THE SAMPLES COLLECTED  
AT RIG INDUSTRIES ON 9/23/85. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 214  
10/11/85 CODE: LET ROSE C  
CERTIFICATION SIGNED OCTOBER 11, 1985, BY WALTER  
CAROLAN OF COMPLIANCE WITH PARAGRAPH 1 OF CONSENT  
AGREEMENT THAT TO THE BEST OF HIS KNOWLEDGE NO  
VIOLATIONS ALLEGED IN COMPLAINT PRESENTLY EXIST;  
SENT BY COVER LETTER OCTOBER 11, 1985.

RECORD NUMBER 215  
10/22/85 CODE: INSP MDNR  
INSPECTION REPORT FROM 10/2/85 INSPECTION BY MDNR.

RECORD NUMBER 216  
10/28/85 CODE: INSP EPA  
INSPECTION OF ASNER IRON & METAL.

RECORD NUMBER 217  
11/08/85 CODE: LET EPA P  
LETTER FROM SPRATLIN TO MCR CONFIRMING PCB  
DISPOSAL OPERATORS MEETING ON 11/19/85.

RECORD NUMBER 218  
11/18/85 CODE: CONFERENCE  
MAYOR BRILLHARDT REQUESTED LEO ALDERMAN AND JUDY  
STURGESS MEET WITH BRILLHARDT. WE SUGGESTED HE  
WRITE DOWN CONCERNS AND QUESTIONS AND GIVE US A  
CALL TO SET UP MEETING DATE. BRILLHARDT DID NOT  
SUBSEQUENTLY REQUEST ANY MEETING.

RECORD NUMBER 219  
11/19/85 CODE: MEETING  
MORRIS KAY MET WITH THE PCB DISPOSAL OPERATORS  
WITHIN REGION VII AND DISCUSSED THEIR ACTIVITIES.

RECORD NUMBER 220  
11/22/85 CODE: INSP MDNR  
RESULTS OF ANALYSIS FROM SAMPLES IN PIN OAK CREEK,  
SLUDGE AND AREA AROUND ROSE. ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 221  
11/22/85 CODE: INSP MDNR  
ANALYTICAL RESULTS FROM SAMPLES COLLECTED BY LARRY  
ANDERSON, LSP.

RECORD NUMBER 222  
11/26/85 CODE: LET GENRL  
ELECTRIC COMPANY OF OMAHA, NEBRASKA, LETTER TO  
ROSE CHECKING ON STATUS OF PCBs SHIPPED TO ROSE.

RECORD NUMBER 223  
12/12/85 CODE: LET ROSE C  
CHECK DECEMBER 12, 1985, FOR \$10,000 IN PARTIAL  
SETTLEMENT OF TSCA DOCKET NO. VII-84-T-331; SENT  
BY COVER LETTER.

RECORD NUMBER 224  
12/13/85 CODE: LET HDQ  
LETTER TO HEADQUARTERS.

RECORD NUMBER 225  
12/17/85 CODE: INSP EPA  
INSPECTION OF RIG INDUSTRIES, KANSAS CITY, MO  
COLLECTED COPY OF SCALE TICKET ON THE LOAD OF  
SCRAP METAL RECEIVED 9/23/85 FROM ASNER IRON &  
METAL.

RECORD NUMBER 226  
12/18/85 CODE: INSP EPA  
INSPECTION OF ASNER IRON & METAL, KANSAS CITY,  
KANSAS. INSPECTION REVEALED THAT A LOAD OF SCRAP  
METAL BROKERED TO RIG INDUSTRIES ON 9/23/85 WAS  
FROM ROSE.

RECORD NUMBER 227  
12/19/85 CODE: INSP EPA  
AN INSPECTION OF ROSE'S FACILITY IN HOLDEN,  
MISSOURI, NOTED VIOLATIONS. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 228  
12/27/85 CODE: LET ROSE D  
LETTER FROM CLAY-UNION ELECTRIC CORP. TO MCR  
REQUEST CERTIFICATE OF DISPOSAL FOR MANIFEST NO.  
1091.

RECORD NUMBER 229  
12/27/85 CODE: INSP EPA  
INSPECTION OF ASNER IRON & METAL, KANSAS CITY,  
KANSAS. INSPECTION REVEALS METAL FROM ROSE.  
SAMPLES WERE TAKEN OF THE COPPER WIRE FROM PCB  
TRANSFORMER CORES.

RECORD NUMBER 230  
12/27/85 CODE: INSP MDNR  
RESULTS OF ANALYSIS FROM SAMPLES COLLECTED ON  
9/25/85 IN HOLDEN, MISSOURI, PRIMARILY SLUDGE  
SAMPLES. DATA ENFORCEMENT SENSITIVE.

RECORD NUMBER 231  
01/03/86 CODE: LET ROSE  
ROSE LETTER TO HEADQUARTERS.

RECORD NUMBER 232  
01/07/86 CODE: INSP EPA  
INSPECTION OF ROSE FACILITY IN HOLDEN, MISSOURI,  
DATA COLLECTED ENFORCEMENT SENSITIVE.

RECORD NUMBER 233  
01/13/86 CODE: INSP EPA  
RECEIVED LAB RESULTS ON SAMPLES COLLECTED DURING  
JANUARY 7, 1986, ENFORCEMENT SENSITIVE.

RECORD NUMBER 234  
01/13/86 CODE: LET ROSE C  
ROSE TO DAVID RAMSEY STATING EFFORTS ARE BEING  
MADE TO COMPLY WITH SUMMARY OF OBSERVATIONS LEFT  
REGARDING INSPECTIONS JANUARY 7, 1986 AND DECEMBER  
19, 1985.

RECORD NUMBER 235  
01/14/86 CODE: PHONE MAYR  
PHONE CONVERSATION NOTES FROM SPRATLIN TO MAYOR  
BRILLHART OF HOLDEN, REGARDING \$14 MILLION LAW  
SUIT AGAINST CITY, PAYMENT OF ROSE COMPLAINTS AND  
CONSENT AGREEMENT.

RECORD NUMBER 236  
01/17/86 CODE: INSP EPA  
EPA REPORT OF RESPONSE TO SPILL REPORT AT ROSE.  
RECEIVED 1348 HOURS ON 1/6/86.

RECORD NUMBER 237  
01/23/86 CODE: MEMO EPA  
MEMO FROM LYNN HARRINGTON, RCRA, TO JUDITH  
STURGESS, TOPE, REGARDING FINANCIAL ASSURANCE AND  
LIABILITY DOCUMENTATION FOR HOLDEN FACILITY.

RECORD NUMBER 238  
01/23/86 CODE: LET ROSE A  
GOLDSTEIN TO HENRY ROMPAGE REGARDING LEO  
ALDERMAN'S JANUARY 21, 1986, LETTER RE ROSE  
SUBMITTAL OF NON CBI APPLICATIONS FOR APPROVALS TO  
COMPLY WITH PREVIOUS CONSENT AGREEMENTS.

RECORD NUMBER 239  
01/28/86 CODE: INSP EPA  
SPILL REPORT TRANSMITTED.

RECORD NUMBER 240  
01/30/86 CODE: MEMO EPA  
UNDATED LISTING OF COMPLIANCE HISTORY OF MCR. DATE  
APPROXIMATE.

RECORD NUMBER 241  
02/11/86 CODE: LET EPA A  
EPA'S ACKNOWLEDGING RECEIPT OF 4 COPIES OF  
NON-CONFIDENTIAL BUSINESS INFORMATION AND 1 CBI  
COPY FOR CHEMICAL DETOXIFICATION OF PCB  
CONTAMINATED HYDROCARBON FLUIDS, PCB  
DECONTAMINATION  
OF TRANSFORMERS AND OTHER RELATED ELECTRICAL  
EQUIPMENT DETOXIFICATION AND RESOURCE RECOVERY OF  
PCB CAPACITORS.

RECORD NUMBER 242  
02/12/86 CODE: INSP EPA  
SAMPLE ANALYSIS RESULTS FROM 12/27/85 INSPECTION  
OF ASNER IRON & METAL. SAMPLE RESULTS ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 243  
02/13/86 CODE: LET EPA A  
NOTICE OF INTENT TO REVOKE TRANSFORMER PROCESSING  
APPROVAL; COMPLIANCE REQUIRED BY MARCH 15, 1986.

RECORD NUMBER 244  
02/13/86 CODE: LET EPA A  
NOTIFICATION OF STATUS OF OIL DETOXIFICATION  
APPROVAL; EXPIRATION 3-15-86, EPA DECISION NOT TO  
CONSIDER APPROVAL UNTIL COMPLIANCE ACHIEVED.

RECORD NUMBER 245  
02/13/86 CODE: LET EPA A  
NOTICE OF INTENT TO REVOKE CAPACITOR PROCESSING  
APPROVAL; COMPLIANCE REQUIRED BY MARCH 15, 1986.

RECORD NUMBER 246  
02/14/86 CODE: PHONE MAYR  
RUBEN MC CULLERS RECEIVED REPORT OF 400 GALLON OIL  
SPILL FROM MAYOR BRILLHART. REFERRED TO JOE  
JOSLIN, ENSV, FOR RESPONSE.

RECORD NUMBER 247  
02/18/86 CODE: PHONE MAYR  
BRILLHART WAS CHECKING ON STATUS OF SPILL REPORT  
MADE ON 2/14/86 TO RUBEN MC CULLERS. INFORMED  
SPILL REFERRED TO ENSV FOR RESPONSE.

RECORD NUMBER 248  
02/20/86 CODE: MEETING R  
EPA AND 4 ROSE OFFICIALS. REGARDING INTENT TO  
REVOKE. DISCUSSED VIOLATIONS WHICH ARE BASIS OF  
ACTION. NEED FOR COMPLIANCE BY MARCH 15, 1986.

RECORD NUMBER 249  
02/20/86 CODE: MEMO EPA  
CHRONOLOGY OF ENSV CONVERSATIONS OVER ROSE SPILL  
FROM 2/18/86 - 2/19/86.

RECORD NUMBER 250  
02/25/86 CODE: PHONE ROSE  
HENRY ROMPAGE AND GOLDSTEN, MARTHA C. ROSE  
CHEMICAL CO.'S ATTORNEY, INQUIRING ABOUT RUMOR OF  
ROSE SHUTTING DOWN OPERATIONS.

RECORD NUMBER 251  
02/26/86 CODE: INSP EPA  
INSPECTION REPORT. DATA ENFORCEMENT SENSITIVE.

RECORD NUMBER 252  
02/27/86 CODE: MEMO EPA R  
TCR REGARDING PHONE CALL FROM DAVID RAMSEY WHO WAS  
IN HOLDEN. REQUESTED RAMSEY TO TAKE PLENTY OF  
PICTURES, DOCUMENT EVERYTHING.

RECORD NUMBER 253  
02/28/86 CODE: INSP MDNR  
RESULTS OF ANALYSIS COLLECTED BY MDNR IN HOLDEN,  
MISSOURI. DATA ENFORCEMENT SENSITIVE.

RECORD NUMBER 254  
02/28/86 CODE: PHONE RAMS  
DAVID RAMSEY, CONSUMER SAFETY OFFICER IN JEFFERSON  
CITY, MISSOURI (EPA REGION VII FIELD OFFICE),  
REPORTED TO JUDITH STURGESS THAT HE VISITED MARTHA  
C. ROSE CHEMICAL COMPANY ON FEBRUARY 26 AND 27,  
1986, INVENTORIED MATERIAL.

RECORD NUMBER 255  
02/28/86 CODE: LET CON6  
- LETTER TO ART SPRATLIN CONCERNING WASTE TECH  
- SERVICES, INC.  
FROM BLDEAU

RECORD NUMBER 256  
03/03/86 CODE: PHONE GEN  
GOODYEAR CALLED LEO ALDERMAN AND REPORTED ROSE  
SOLICITING PCB DISPOSAL BUSINESS OF GOODYEAR.  
WANTED TO KNOW CURRENT STATUS.

RECORD NUMBER 257  
03/03/86 CODE: PHONE GDYR  
TELEPHONE CONVERSATION RECORD REPORTING THAT ROSE  
IS SOLICITING BUSINESS (HFR).

RECORD NUMBER 258  
03/03/86 CODE: SUBPEONA  
HENRY ROMPAGE TO WALTER CAROLAN, RE OPTIONAL  
ANSWER TO SUBPEONA BY MAIL, AFFIDAVIT FORM.

RECORD NUMBER 259  
03/04/86 CODE: SUBPEONA  
MORRIS KAY SIGNS THE SUBPEONA DEMANDS PRESENTATION  
OF DOCUMENTS ON PCB PROCESSING AND THE FINANCIAL  
RECORDS TO WALTER C. CAROLAN, PRESIDENT, MARTHA C.  
ROSE CHEMICAL RELATING TO PCB PROCESSING.

RECORD NUMBER 260  
03/04/86 CODE: SUBPEONA  
MEMO FROM DAVID TRIPP AND ART SPRATLIN REQUESTING  
REGIONAL ADMINISTRATOR MORRIS KAY TO SIGN TSCA  
SUBPEONA.

RECORD NUMBER 261  
03/05/86 CODE: SUBPEONA  
CERTIFICATE OF DELIVERY OF TSCA SUBPEONA TO WALTER  
C. CAROLAN, BY ANTHONY PETRUSKA.

RECORD NUMBER 262  
03/06/86 CODE: TCR EPA R  
ROGER LUHRING, NPPD, TALKED WITH RUBEN MC CULLERS  
REGARDING STATUS OF ROSE.

RECORD NUMBER 263  
03/06/86 CODE: MEMO EPA M  
MEMORANDUM TO FILE REGARDING MEETING WITH GENERAL  
ELECTRIC REPRESENTATIVES. ASKED ABOUT STATUS OF  
FOI REQUEST THAT GENERAL ELECTRIC HAD REGARDING  
ROSE. NO KNOWLEDGE OF THE STATUS.

RECORD NUMBER 264  
03/07/86 CODE: SUBPEONA  
- GOLDSTEIN - OPTION TO RESOND TO SUBPEONA BY MAIL,  
- 3/10/86 (HFR).

RECORD NUMBER 265  
03/08/86 CODE: LET EPA C  
LETTER TO MISSOURI SECRETARY OF STATE ON CORPORATE  
HISTORY OF HAZARDOUS WASTE MANAGEMENT.

RECORD NUMBER 266  
03/10/86 CODE: LET ROSE O  
LETTER RESPONDING TO SUBPEONA AND COPY OF ROSE  
RESPONSE TO SUBPEONA.

RECORD NUMBER 267  
03/11/86 CODE: INSP EPA  
JEFFREY SLATER, REGION VII TATM, SUBMITTED A PLAN  
FOR SAMLING POND LOCATED NEAR HOLDEN, MO, BASED  
UPON REPORT OF TRANSFORMERS DUMP IN POND.  
SUBMITTED TO RON MC CUTCHEON, EPA REGION VII.

RECORD NUMBER 268  
03/11/86 CODE: LET OTHER  
WASTE TECH LETTER.

RECORD NUMBER 269  
03/12/86 CODE: MEETING  
ROSE OFFICIALS, HENRY ROMPAGE. INTENT TO REVOKE.  
ROSE PROPOSED THAT THEY WOULD BUILD A PCB  
INCINERATOR IN KANSAS, REHIRE 60 PEOPLE AND AVOID  
BANKRUPTCY IF WE ALLOWED CONTINUED OPERATION AND  
RECEIPT OF NEW MATERIAL WITH EXISTING PERMIT.  
WOULD CLEANUP THE SITUATION. TIMEFRAME ABOUT 2.5  
YEARS. EPA REJECTED OFFER.

RECORD NUMBER 270  
03/13/86 CODE: PHONE MAYR  
MAYOR BRILLHART CALLED, WANTED RESULTS OF 3/12/86  
MEETING WITH ROSE. MC CULLERS SAID THE MEETING  
WAS CONFIDENTIAL, BUT EPA'S POSITION ON ROSE WAS  
NOT EFFECTED BY THE MEETING. BRILLHART ASKED  
ABOUT SITE SECURITY. MC CULLERS SAID ROSE STILL  
RESPONSIBLE FOR SITE SECURITY.

RECORD NUMBER 271  
03/15/86 CODE: CIVIL  
ROSE'S ANSWER AND REQUEST FOR HEARING WAS  
SUBMITTED TO EPA.

RECORD NUMBER 272  
03/17/86 CODE: PHONE OTHR  
TCR REGARDING JEFF FOSTER, COFFEYVILLE, KS.  
CALLED AND ASKED STATUS OF ROSE AS OF 3/15/86.  
ROBERT FENEMORE SAID NO EPA ACTION AS OF THIS  
DATE. DISCUSSED NEODESHA TOWN MEETING ON ROSE.

RECORD NUMBER 273  
03/17/86 CODE: LET GEN  
OKANOGAN COUNTY OF WASHINGTON'S LETTER TO ROSE ON  
STATUS OF PCB ITEMS SHIPPED TO ROSE.



RECORD NUMBER 274  
03/17/86 CODE: SUBPEONA  
HENRY ROMPAGE'S AFFIDAVIT SUPPORTING EXPORT  
PETITION FOR ORDER TO SHOW CAUSE ON ENFORCING TSCA  
SUBPEONA.

RECORD NUMBER 275  
03/17/86 CODE: insp epa  
INSPECTION of ROSE TO DETERMINE IF THE FACILITY  
WAS PROCESSING AFTER MARCH 15, 1986. THEY WERE  
NOT, BUT VIOLATIONS NOTED IN EARLIER INSPECTIONS  
WERE NOT CORRECTED.

RECORD NUMBER 276  
03/17/86 CODE: LET EPA O  
LETTER TO U.S. ATTORNEY REQUESTING INITIATION OF  
ACTION SECTION 17(C) TSCA, REQUIRING ROSE TO  
COMPLY WITH ADMINISTRATIVE SUBPEONA (HFR).

RECORD NUMBER 277  
03/18/86 CODE: LET ROSE  
ROSE'S SUBMITTAL OF GENERATOR LIST TO EPA.

RECORD NUMBER 278  
03/19/86 CODE: LET ROSE O  
ROSE LETTER TO EPA STATING THAT ETI WILL DISPOSE  
OF THE PCBS.

RECORD NUMBER 279  
03/19/86 CODE: PHONE MDNR  
TCR BETWEEN RUBEN MC CULLERS AND JIM PENWALT,  
MDNR, REGARDING CALL FROM BRILLHART TO LT.  
GOVERNOR'S OFFICE THAT MCR IS ABANDONED.

RECORD NUMBER 280  
03/19/86 CODE: PHONE MDNR  
CALL FROM LT. GOV'S OFFICE (MISSOURI) TO PENFOLD  
(MDNR) CONCERNING ROSE. BASED ON INFORMATION  
RECEIVED FROM MAYOR BRILLHART.

RECORD NUMBER 281  
03/20/86 CODE: MEETING  
ETI AND EPA MEETING. ETI CONTRACTED WITH MARTHA  
C. ROSE TO CLEAN UP SITE WITH BILLING TO THE  
GENERATORS. ETI WILL INVENTORY. ROSE MAY PAY  
PART WITH MONEY FROM \$41,000,000 LAW SUIT AGAINST  
HOLDEN.

RECORD NUMBER 282  
03/20/86 CODE: MEETING  
ROSE OFFICIALS, HENRY ROMPAGE AND RUBEN MC CULLERS  
(BOTH OF EPA). RESPONSE TO NOTICE OF INTENT TO  
REVOKE. ROSE STATED THEY PLANNED TO CLOSE HOLDEN  
SITE AND MOVE TO KANSAS AND BUILD PCB INCINERATOR.  
EPA EXPLAINED WE WANTED COMPLIANCE WITH  
PERMIT/REGULATIONS BY APRIL 15, 1986, AND THAT EPA  
WOULD INSPECT.

RECORD NUMBER 283  
03/20/86 CODE: SUBPEONA  
SHOW CAUSE ORDER FOR FAILURE TO RESPOND TO TSCA  
SUBPEONA.

RECORD NUMBER 284  
03/20/86 CODE: ARTICLE  
KANSAS CITY STAR ARTICLE ON ROSE.

RECORD NUMBER 285  
03/21/86 CODE: SUBPEONA  
EX-PARTE PETITIONS FOR SHOW CAUSE ORDER FOR  
ENFORCEMENT OF TSCA ADMINISTRATIVE SUBPEONA.

RECORD NUMBER 286  
03/21/86 CODE: PHONE GEN  
CONCERNED GENERATOR COUNSEL REQUESTING INFO ON EPA  
HANDLING OF ROSE CASE (WEST TEXAS UTILITIES).

RECORD NUMBER 287  
03/24/86 CODE: SUBPEONA E  
STATUS OF SUBPEONA - ADDITION OF FAILURE TO  
COMPLY WITH CONSENT AGREEMENT TERMS.

RECORD NUMBER 288  
03/26/86 CODE: PHONE  
TRIPP NOTES.

RECORD NUMBER 289  
03/26/86 CODE: LET ROSE  
LETTER GOLDSTEIN/TRIPP DISCUSS GENERATOR MEETING.

RECORD NUMBER 290  
03/27/86 CODE: LET EPA O  
LETTER FROM LEO ALDERMAN TO MRS. ELLIE WRIGHT  
REQUESTING HER TO CALL EPA IF SHE HAS INFORMATION  
ON MCR BOOKKEEPING GAINED WHILE EMPLOYED BY MCR.

RECORD NUMBER 291  
03/27/86 CODE: INSP EPA  
ENSV TRANSMITTAL OF DATA FROM THE 3/14/86  
INSPECTION OF HOLDEN-POND. NO PCBS DETECTED.

RECORD NUMBER 292  
03/28/86 CODE: LET MDC  
LETTER TO RODMAN REPORTING RESULTS OF SAMPLING IN  
PIN OAK CREEK.

RECORD NUMBER 293  
03/31/86 CODE: LET EPA D  
LETTER TO KANSAS REPRESENTATIVE EDWIN BIDEAU  
RESPONDING TO HIS 2/28/86 LETTER ON WASTE TECH  
SERVICES, INC.

RECORD NUMBER 294  
04/01/86 CODE: LET EPA G  
LETTER FROM WALTER CAROLAN TO THE GENERATORS AS TO  
THE STATUS OF MARTHA C. ROSE CHEMICAL COMPANY.

RECORD NUMBER 295  
04/01/86 CODE: D & B  
D & B OF MARTHA C. ROSE; AMERICAN STEEL WORKS,  
INC.; DUST SUPPRESSION, INC.; AND WALTER C.  
CAROLAN CO., INC.

RECORD NUMBER 296  
04/02/86 CODE: SUBPEONA  
JUDGE'S DECISION TO ALLOW MORE TIME FOR RESPONSE  
ON THE SHOW CAUSE ORDER.

RECORD NUMBER 297  
04/03/86 CODE: LET ROSE D  
ROSE LETTER ABOUT MATERIAL SUBMITTED PER SUBPEONA.

RECORD NUMBER 298  
04/08/86 CODE: MEMO EPA  
CLOSE OF CRIMINAL INVESTIGATION. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 299  
04/10/86 CODE: INSP EPA  
INTERVIEW WITH FORMER ROSE EMPLOYEE. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 300  
04/11/86 CODE: LET GEN  
IOWA PUBLIC SERVICE COMPANY LETTER TO EPA  
PROVIDING INFORMATION ON PCBS SHIPPED TO ROSE

RECORD NUMBER 301  
04/11/86 CODE: LET EPA O  
SPRATLIN'S LETTER TO IOWA PUBLIC SERVICE COMPANY,  
PROVIDED KNOWN GENERATOR LIST.

RECORD NUMBER 302  
04/14/86 CODE: LET EPA O  
REQUEST FOR INFORMATION OF ROSE AND CAROLAN'S  
RELATED COMPANIES TO MISSOURI SECRETARY OF STATE.

RECORD NUMBER 303  
04/14/86 CODE: LET ETI R  
LETTER FROM ROSE TO ETI CONFIRMING AGREEMENT TO  
ACQUIRE ROSE.

RECORD NUMBER 304  
04/15/86 CODE: INSP MDNR  
ENFORCEMENT SENSITIVE REPORT CONCERNING VIOLATIONS  
AT ROSE.

RECORD NUMBER 305  
04/16/86 CODE: LET GEN  
LOUPE RIVER POWER DISTRICT LETTER TO EPA PROVIDING  
LIST OF MATERIAL SHIPPED TO ROSE

RECORD NUMBER 306  
04/18/86 CODE: INSP EPA  
THE FINAL SAMPLING REPORT ON HOLDEN POND, SAMPLES  
COLLECTED 3/14/86.

RECORD NUMBER 307  
04/22/86 CODE: LET EPA O  
LETTER TO MARK T. PIFHER SPECIFYING INFORMATION  
REQUESTED UNDER FOI 86-200. INFORMATION INCLUDES  
APPROVALS TO MCR AND GENERATORS.

RECORD NUMBER 308  
04/23/86 CODE: LET EPA R  
EPA'S LETTER TO ETI INQUIRING ETI'S POSITION ON  
CLEANUP OF ROSE.  
<<=

RECORD NUMBER 309  
04/23/86 CODE: LET ROSE O  
GOLDSTEIN LETTER ON SUBPEONA RESPONSE.

RECORD NUMBER 310  
04/23/86 CODE: LET HOLDEN  
FOI FROM CITY OF HOLDEN REQUESTING COPIES OF  
PERMIT, COMPLAINTS, NOTIFICATIONS OF REVOCATION  
AND CORRESPONDENCE RELATING TO THE ABOVE.

RECORD NUMBER 311  
04/23/86 CODE: LET EPA D  
TRIPP LETTER TO ETI PER 4/17/86 MEETING AND  
DISCUSSION OF DRAFT ETI/ROSE LETTER OF APRIL 14,  
1986. NOTIFIED THEM THAT PERMITS ARE SUBJECT TO  
REVOCATION AND THAT VIOLATIONS EXIST AT THE SITE.  
ETI MAY NOT DISPOSE USING ROSE APPROVALS. ALSO  
STATES THAT TOTAL CLEANUP IS REQUIRED.

RECORD NUMBER 312  
04/24/86 CODE: MEMO USA  
COPY OF JUDGE'S DECISION TO ALLOW ROSE MORE TIME  
TO RESPOND TO SUBPEONA, INCLUDES COPY OF 4/23/86  
APPLICATION BY ROSE FOR MORE TIME.

RECORD NUMBER 313  
04/28/86 CODE: MEMO EPA  
BRIEF MEMO ON LITIGATION PACKAGE FROM DAVE TRIPP  
TO MORRIS KAY.

RECORD NUMBER 314  
04/28/86 CODE: LET ROSE S  
COPY OF ROSE'S RESPONSE TO SHOW CAUSE MOTION TO  
TSCA SUBPEONA.

RECORD NUMBER 315  
04/28/86 CODE: LITIGATION  
REFERRAL OF ROSE LITIGATION PACKAGE TO MAYS  
(LE-133) FOR REFERRAL TO DOJ.

RECORD NUMBER 316  
04/29/86 CODE: LET EPA D  
DRAFT LITIGATION PACKAGE SENT TO REDD, DEPARTMENT  
OF JUSTICE, FOR REVIEW PRIOR TO REFERRAL.

RECORD NUMBER 317  
05/01/86 CODE: LET ROSE S  
LETTER TO GENERATORS FROM ROSE IN REGARDS TO  
STATUS OF ETI.

RECORD NUMBER 318  
05/01/86 CODE: LET ETO P  
ETI'S LETTER TO EPA IN REGARDS TO THE CLEANUP  
PLAN.

RECORD NUMBER 319  
05/01/86 CODE: LET ROSE D  
DRAFT LETTER FROM ROSE NOTIFYING THE GENERATORS  
THAT THEY WERE NO LONGER IN BUSINESS AND COULD NOT  
DISPOSE OF THE PCBs ON HAND. SUGGESTED THEY  
CONTRACT WITH ETI FOR CLEANUP.

RECORD NUMBER 320  
05/02/86 CODE: LET CWM C  
LETTER FROM CHEM WASTE MANAGEMENT PROPOSING TO  
INCINERATE CAPACITOR CORES FROM ETI.

RECORD NUMBER 321  
05/05/86 CODE: PHONE MAYR  
CONVERSATION NOTES BETWEEN MAYOR BRILLHART AND ART  
SPRATLIN REGARDING PCB ODOR FROM MCR. WANT CITY  
TO CLOSE SEWER FROM PLANT.

RECORD NUMBER 322  
05/06/86 CODE: MEETING  
ENVIROSURE PRESENTED CLEAN-UP PLAN FOR MARTHA C.  
ROSE. ESTIMATED 20M LBS. AND \$20M COST. HAD MET  
WITH WALTER CAROLAN ALREADY.

RECORD NUMBER 323  
05/06/86 CODE: LET ROSE D  
LETTER STATING THAT ROSE AT THIS TIME CHOSE ONLY  
TO DEAL WITH ETI ON CLEANUP.

RECORD NUMBER 324  
05/07/86 CODE: MEMO USA  
MEMO FROM POSCHEL (U.S. ATTORNEY) TO HENRY  
ROMPAGE, EPA, PROVIDING A COPY OF ORDER ENTERED  
5/5/86 ON "SHOW CAUSE" ENTERED 3/20/86 FOR ROSE'S  
FAILURE TO RESPOND TO INITIAL SUBPEONA.

RECORD NUMBER 325  
05/07/86 CODE: MEETING  
GENERATOR MEETING: EPA SPEAKER, ART SPRATLIN.

RECORD NUMBER 326  
05/08/86 CODE: MEETING G  
GENERATOR MEETING NOTES, ATTENDEES, IN-HOUSE  
DISCUSSION NOTES.

RECORD NUMBER 327  
05/08/86 CODE: LET NIX D  
LETTER TO ETI FROM DENNIS NIX. AGREEMENT FOR  
DISPOSAL.

RECORD NUMBER 328  
05/08/86 CODE: LET OHM CU  
LETTER TO ETI FROM COPUS, OHM REGARDING SUBCONTRACT  
CLEANUP.

RECORD NUMBER 329  
05/08/86 CODE: PHONE EPA  
S.E.D. CLEANUP REGION IV. PROCEDURE/STATUS

RECORD NUMBER 330  
05/08/86 CODE: AGREMNT CU  
CLEANUP AGREEMENT BETWEEN ROSE/ETI.

RECORD NUMBER 331  
05/08/86 CODE: LET ETI CU  
ETI PROPOSED CLEANUP PLAN (FIRST ADDITION).

RECORD NUMBER 332  
05/08/86 CODE: LET EPA N  
NOTES ON EPA'S POSITION FROM ART SPRATLIN.

RECORD NUMBER 333  
05/08/86 CODE: LET EPA C  
MORRIS KAY'S LETTER NOTIFYING ROSE OF ITS  
VIOLATION OF CONSENT AGREEMENT FOR VII-84-T-331  
AND THE REQUIRED PAYMENT OF THE REMAINING PENALTY  
(\$74,000) WITHIN 20 DAYS OF RECEIPT.

RECORD NUMBER 334  
05/08/86 CODE: MEETING  
NOTES FROM GENERATOR MEETING.

RECORD NUMBER 335  
05/09/86 CODE: LET EPA O  
DAVE TRIPP'S LETTER TO ROSE IN ANSWER TO ROSE'S  
5/6/86 LETTER STATING WHAT EPA REQUIRED OF ROSE  
AND ITS UNDERSTANDING OF ETI'S ROLE. REQUIRED  
COMPLIANCE WITH CONSENT ORDER AND REGULATIONS,  
COPY TO KNOWN GENERATORS.

RECORD NUMBER 336  
05/09/86 CODE: LET PAI D  
LETTER TO ETI FROM SCHAMEL, PCB INC. TO  
PARTICIPATE IN DISPOSAL ACTIVITIES.

RECORD NUMBER 337  
05/12/86 CODE: LET GEN G  
LETTER TO EPA FROM GENERATORS' STEERING COMMITTEE,  
J. ROBINSON.

RECORD NUMBER 338  
05/12/86 CODE: LET EPA CS  
LETTER TO JENE ROBINSON FROM ART SPRATLIN  
REGARDING CLEAN SITES.

RECORD NUMBER 339  
05/12/86 CODE: PHONE  
SPRATLIN TCR.

RECORD NUMBER 340  
05/14/86 CODE: LET EPA ET  
NOTES ON TCR WITH ART SPRATLIN AND ETI.

RECORD NUMBER 341  
05/14/86 CODE: LET STATE  
INCORPORATION RECORDS OF HAZARDOUS WASTE  
MANAGEMENT.

RECORD NUMBER 342  
05/14/86 CODE: LET GEN 60  
LETTER TO GENERATORS FROM J. ROBINSON ANNOUNCING  
GENERATOR ORGANIZATION.

RECORD NUMBER 343  
05/14/86 CODE: LET GEN G  
LETTER TO EPA FROM MS. FERGUS REGARDING  
GENERATORS' MEETING.

RECORD NUMBER 344  
05/15/86 CODE: PHONE STAT  
HENRY ROMPAGE, ATTORNEY FOR EPA REGION VII, CALLED  
TO GET FROM MISSOURI SECRETARY OF STATE THE  
OFFICERS AND DIRECTORS. INFORMATION NOT AVAILABLE  
-- NO ANNUAL REPORT ON FILE.

RECORD NUMBER 345  
05/15/86 CODE: LET EPA CU  
COVER LETTER FOR PROPOSAL FOR PCB CLEANUP AT ROSE  
TO DAVE TRIPP, EPA REGION VII CNSL.

RECORD NUMBER 346  
05/16/86 CODE: MEMO SPAUL  
MEMO FROM SPAULDING TO SPRATLIN TRANSMITTING  
REPORTS OF INTERVIEWS CONDUCTED FROM MAY & JUNE  
1985

RECORD NUMBER 347  
05/16/86 CODE: MEETING  
MEETING BETWEEN ART SPRATLIN, HENRY ROMPAGE, AND  
ETI WHEREIN ETI STATED THEY HAD MANAGEMENT CONTROL  
OF ROSE SITE AND DISCUSSION OF ETI PLANS FOR  
CLEANUP AND BILLING. STATED 25 GENERATORS ALREADY  
SIGNED UP.



RECORD NUMBER 348  
05/16/86 CODE: RPT EPA S  
SPILL REPORT GIVEN OVER TELEPHONE.

RECORD NUMBER 349  
05/18/86 CODE: CIVIL  
REGIONAL HEARING CLERK TRANSMITTED TO  
ADMINISTRATIVE LAW JUDGE FINCH OF ROSE'S ANSWER TO  
DOCKET NO. VII-84-T-181.

RECORD NUMBER 350  
05/19/86 CODE: LET OTHERC  
NOTIFICATION OF CLEANUP AT ROSE AND OFFER TO ALLOW  
GENERATOR TO CLEANUP OWN MATERIALS. THIS IS A  
FORM LETTER TO GENERATORS OF MATERIALS AT ROSE  
FROM STEVEN KAY.

RECORD NUMBER 351  
05/19/86 CODE: LET GENRAT  
BRADSHAW, NEBRASKA, CONCERNING PCBS SHIPPED TO  
ROSE AND ASKING FOR GUIDANCE.

RECORD NUMBER 352  
05/19/86 CODE: LET ETI  
ETI LETTER TO ILLINOIS POWER.

RECORD NUMBER 353  
05/20/86 CODE: INSP EPA S  
SPILL REPORT REGARDING VISIT TO ROSE FROM HESS TO  
HENSLEY, EPA LABORATORY EMPLOYEES.

RECORD NUMBER 354  
05/21/86 CODE: PHONE EPA  
TCR FROM RUBEN MC CULLERS REGARDING SPILL -  
DISPOSAL OF OIL.

RECORD NUMBER 355  
05/21/86 CODE: LET OTHER  
LETTER TO ART SPRATLIN FROM JENE ROBINSON  
REQUESTING A DOCUMENT.

RECORD NUMBER 356  
05/21/86 CODE: PHONE EPA  
SPILL REPORT TO ART SPRATLIN FROM STEVE KAY, ETI.

RECORD NUMBER 357  
05/21/86 CODE: PHONE  
TCR.

RECORD NUMBER 358  
05/22/86 CODE: PHONE EPA  
TCR FROM BOB JACKSON REGARDING WATER ANALYSES -  
SPILL.

RECORD NUMBER 359  
05/22/86 CODE: LET EPA CU  
NOTIFICATION OF FINANCIAL RESPONSIBILITY FOR ROSE  
CLEANUP. THIS LETTER IS FROM GEORGE HESS TO  
WALTER CAROLAN, PRESIDENT, MARTHA C. ROSE.

RECORD NUMBER 360  
05/22/86 CODE: LET EPA O  
SPRATLIN'S LETTER TO ETI STATING EPA DID NOT  
ENDORSE ETI'S PLAN.

RECORD NUMBER 361  
05/22/86 CODE: MEMO CUP  
STATUS OF ROSE CLEANUP TO CHARLES HENSLEY, EPA  
REGION VII LABORATORY, KANSAS CITY, KANSAS.

RECORD NUMBER 362  
05/22/86 CODE: PHONE EPA  
TCR FROM LEO ALDERMAN REGARDING THE STEERING  
COMMITTEE.

RECORD NUMBER 363  
05/22/86 CODE: LET EPA M  
MEMO TO FILE REGARDING MEETING WITH ETI.

RECORD NUMBER 364  
05/22/86 CODE: INSP EPA  
HESS TCR.

RECORD NUMBER 365  
05/23/86 CODE: CONG  
CONGRESSIONAL RESPONSE TO SENATOR LARRY PRESSLER'S  
LETTER OF 4/28/86 REGARDING A ROBERT FERAGAN'S  
(CONSTITUENT) REQUEST TO MONITOR PCB FACILITIES.

RECORD NUMBER 366  
05/23/86 CODE: MEETING  
ROSE STEERING COMMITTEE

RECORD NUMBER 367  
05/23/86 CODE: ORDER  
CERCLA 106 ORDER SENT TO ROSE, ETC.

RECORD NUMBER 368  
05/27/86 CODE: LET EPA 0  
MEMORANDUM TO CRAIG SMITH FROM SCOTT PEMBERTON  
REGARDING CERCLA 106 ORDER.

RECORD NUMBER 369  
05/27/86 CODE: LET CS CS  
LETTER TO ART SPRATLIN FROM J. ROBINSON REGARDING  
SELECTION OF CLEAN SITES AS THE NEW CONTACTOR.

RECORD NUMBER 370  
05/27/86 CODE: LET ROSE 0  
COPY OF AGREEMENT BETWEEN ROSE/ETI TRANSMITTED BY  
COUNSEL.

RECORD NUMBER 371  
05/29/86 CODE: LET EPA 0  
EPA'S LETTER ASKING ROSE TO SUPPORT CBI STATUS ON  
DOCUMENTS SUBMITTED.

RECORD NUMBER 372  
05/30/86 CODE: MEMO EPA  
SCOTT PEMBERTON, EPA REGION VII CNSL, MEMO  
DISCUSSING PLANS FOR THE JUNE 3, 1986, MEETING  
WITH ROSE IN RESPONSE TO THE 106 ORDER.

RECORD NUMBER 373  
05/30/86 CODE: PHONE RSAT  
GOLDSTEIN, ROSE'S ATTORNEY, NOTIFIED HENRY ROMPAGE  
THAT SPENSWER, FANE HAD WITHDRAWN FROM ROSE  
BECAUSE OF CONFLICT OF INTEREST. SAID ROSE NEEDS  
ANOTHER WEEK TO GET SUBPEONA DATA TOGETHER.

RECORD NUMBER 374  
06/02/86 CODE: MEMO HQ  
MEMO FROM MAYS (DECM) STATING THAT HE CONCURRED ON  
THE SECTION 17 CHARGES AGAINST ROSE AND HAS  
REFERRED THE CASE TO JUSTICE.

RECORD NUMBER 375  
06/03/86 CODE: MEETING  
NOTES ON 106 MEETING WITH ROSE. MEETING DISCUSSED  
SPILL CLEANUP, FENCING, ETI INVOLVEMENT (CLAIMED  
NO RESPONSIBILITY, BUT WORKED ANYWAY), COMPLETE  
SITE CLEANUP AND DEADLINE FOR ROSE. ATTENDEES OF  
THE MEETING WERE ROSE, ETI, HOLDEN, LEAR/SIEGLER,  
EPA, EPA CONTRACTOR (BLACK AND VEATCH). ROSE  
CLAIMED SLUDGE FROM ANOTHER SOURCE.

RECORD NUMBER 376  
06/03/86 CODE: MEMO EPA  
UPDATE OF ROSE CLEANUP TO CHARLES HENSLEY.

RECORD NUMBER 377  
06/03/86 CODE: LET ETI  
LETTER TO ILLINOIS POWER FROM S. KAY, ETI, ON  
ETI'S PROPOSED PLAN.

RECORD NUMBER 378  
06/03/86 CODE: MEMO  
ROSE STEERING COMMITTEE

RECORD NUMBER 379  
06/05/86 CODE: TCR EPA ET  
TELEPHONE CONVERSATION RECORD WITH J. ROBINSON  
REGARDING CONVERSATION WITH ETI.

RECORD NUMBER 380  
06/05/86 CODE: LET EPA O  
EPA LETTER TO CITY OF BRADSHAW, NEBRASKA,  
RESPONDING TO THEIR 5/19/86 LETTER.

RECORD NUMBER 381  
06/05/86 CODE: LET ATTY A  
LETTER TO KULINOWSKI FROM PEMBERTON RE  
CONFIRMATION OF 6/3/86 AGREEMENTS.

RECORD NUMBER 382  
06/05/86 CODE: LET ATTY A  
LETTER TO ATTORNEY ANDERSON FROM SCOTT PEMBERTON  
REGARDING CONFIRMATION OF 6/3/86 AGREEMENTS.

RECORD NUMBER 383  
06/06/86 CODE: LET ETO TA  
LETTER FROM ETI TO MARTHA C. ROSE TERMINATING  
AGREEMENT.

RECORD NUMBER 384  
06/09/86 CODE: LET ATTY R  
RESPONSE FROM ANDERSON TO SCOTT PEMBERTON'S 6/5/86  
LETTER.

RECORD NUMBER 385  
06/10/86 CODE: LET EPA O  
EPA'S LETTER, SIGNED BY MORRIS KAY, TO HABICHT  
CONCERNING ADDITION OF FAILURE TO COMPLY WITH TSCA  
CONSENT AGREEMENT, ADDED TO THE CASE REFERRED TO  
THE DEPARTMENT OF JUSTICE.

RECORD NUMBER 386  
06/10/86 CODE: LET DOJ CR  
LETTER FROM DEPT. OF JUSTICE TO EPA HEADQUARTERS  
ASSIGNING CIVIL REFERRAL TO BRYAN REDD.

RECORD NUMBER 387  
06/10/86 CODE: LET ATTY I  
LETTER FROM ANDERSON TO PEMBERTON REGARDING  
INVENTORY PLAN.

RECORD NUMBER 388  
06/10/86 CODE: LET ATTY S  
LETTER FROM ANDERSON TO PEMBERTON REGARDING  
SAMPLING PLAN.

RECORD NUMBER 389  
06/10/86 CODE: LET ATTY F  
LETTER FROM ANDERSON TO PEMBERTON REGARDING FENCE  
PLAN.

RECORD NUMBER 390  
06/10/86 CODE: LET EPA CP  
LETTER FROM DAVID TRIP TO DEPT. OF JUSTICE  
(HABICHT), REQUESTING ACTION TO COLLECT UNPAID  
CIVIL PENALTY.

RECORD NUMBER 391  
06/11/86 CODE: LET SNEW D  
LETTER FROM SOUTH NORWALK ELECTRIC WORKS TO EPA  
REGARDING DOCUMENTS OF DISPOSAL WITH ROSE.

RECORD NUMBER 392  
06/11/86 CODE: LET ETI  
LETTER FROM ETI RESPONDING TO MDNR LETTER OF JUNE  
3, 1986, STATING THAT ROSE IS RESPONSE PARTY FOR  
MAY 16, 1986 SPILL.

RECORD NUMBER 393  
06/16/86 CODE: MEMO EPA  
MEMO FROM CHARLES HENSLEY TO ROBERT MORBY  
REGARDING CLEANUP ACTIVITIES AT ROSE (REPORT BY  
ROBERT FINE, REGION VII TATM).

RECORD NUMBER 394  
06/17/86 CODE: LET ETI  
ETI/KPL LETTER.

RECORD NUMBER 395  
06/19/86 CODE: LET ROSE O  
ROSE LETTER REQUESTING RETURN OF ALL SUBMITTED  
C.B.I.

RECORD NUMBER 396  
06/23/86 CODE: LET SHW D  
LETTER FROM SCHIFF, HARDIN & WAITE TO EPA  
REGARDING ETI'S SOLICITING FOR DISPOSAL.

RECORD NUMBER 397  
06/23/86 CODE: LET GEN  
ZABEL LETTER TO PEMBERTON.

RECORD NUMBER 398  
06/24/86 CODE: LET EPA O  
EPA'S LETTER RESTATING NEED TO SUPPORT CBI STATUS,  
DEMANDING RETURN NOT ACCEPTABLE.

RECORD NUMBER 399  
06/26/86 CODE: LET MDNR  
LETTER TO ROSE FROM MDNR REQUIRING REPORTING OF  
THE PCB SPILL OF MAY 16, 1986.

RECORD NUMBER 400  
06/26/86 CODE: LET EPA O  
WILLIAM A. SPRATLIN'S LETTER TO MARTHA C. ROSE  
DENYING CLAIM OF PRIVACY ACT VIOLATION POSED IN  
MARTHA C. ROSE'S LETTER OF JUNE 26, 1986.

RECORD NUMBER 401  
06/26/86 CODE: LET ROSE O  
MARTHA C. ROSE'S LETTER TO EPA'S LETTER OF JUNE  
24, 1986, DEMANDING RETURN OF ALL CBI DATA.

RECORD NUMBER 402  
06/27/86 CODE: LET EPA S  
LETTER FROM EPA TO ETI REGARDING THEIR  
SOLICITATIONS TO GENERATORS.

RECORD NUMBER 403  
06/28/86 CODE: TCR EPA B  
RECORD OF COMMUNICATION FROM LYNN HARRINGTON,  
RCRA, RE TELEPHONE CONVERSATION WITH MAYOR  
BRILLHART, HOLDEN.

RECORD NUMBER 404  
06/28/86 CODE: LET EPA D  
MEMO FROM CHARLES HENSLEY TO BILL KEFFER (BOTH  
FROM EPA REGION VII LABORATORY) RE ANALYSIS OF  
SAMPLES FROM ROSE - HOLDEN.

RECORD NUMBER 405  
07/01/86 CODE: LET EPA C  
ADMINISTRATIVE LAW JUDGE JONES TO ROSE ATTORNEY  
AND CNSL, EXTENDING TIME FOR FILING PREHEARING  
EXCHANGE "TO A DATE TO BE SET."

RECORD NUMBER 406  
07/01/86 CODE: LET MDNR W  
LETTER FROM JAMES MC CONATHY, MISSOURI DEPARTMENT  
OF NATURAL RESOURCES TO DONALD TOENSING, EPA WATER  
MANAGEMENT DIVISION REGION VII, REGARDING ANALYSIS  
OF SAMPLES OF WATER, WASTE WATER, WASTE SLUDGE,  
SOIL FROM PRIVATE PROPERTIES, AND SEDIMENT IN  
HOLDEN AREA.

RECORD NUMBER 407  
07/02/86 CODE: LET EPA D  
DAVID TRIPP'S LETTER TO MARTHA C. ROSE CONCERNING  
DECLASSIFICATION OF CONFIDENTIAL BUSINESS  
INFORMATION.

RECORD NUMBER 408  
07/07/86 CODE: LET EPA D  
HENRY ROMPAGE'S LETTER TO MARTHA C. ROSE DEMANDING  
FULL SERVICE OF SUBPEONAED DOCUMENTS BY JULY 11,  
1986.

RECORD NUMBER 409  
07/07/86 CODE: MEETING  
ROSE STEERING COMMITTEE.

RECORD NUMBER 410  
07/08/86 CODE: LET ROSE  
RUCKER (PARTNER OF ANDERSON) SAYS ANDERSON OUT OF  
TOWN AND CANNOT RESPOND TO EPA JULY 7, 1986,  
LETTER.

RECORD NUMBER 411  
07/09/86 CODE: REVOCATION  
REVOCATION OF TRANSFORMER PROCESSING APPROVAL.

RECORD NUMBER 412  
07/09/86 CODE: REVOCATION  
NOTIFICATION THAT WE WOULD NOT REVIEW FOR RENEWAL  
OF THE OIL PROCESSING APPROVAL.

RECORD NUMBER 413  
07/09/86 CODE: PHONE ROSE  
ANDERSON'S STAFF CALLED TO TELL HENRY ROMPAGE THAT  
ANDERSON ON VACATION UNTIL JULY 14, 1986, AND  
WOULD NOT BE ABLE TO RESPOND TO LETTER.

RECORD NUMBER 414  
07/09/86 CODE: REVOCATION  
REVOCATION OF CAPACITOR PROCESSING APPROVAL.

RECORD NUMBER 415  
07/10/86 CODE: INSP EPA  
TSCA INSPECTION OF MR. MCCOY. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 416  
07/10/86 CODE: MEMO EPA  
MEMO FROM HESS TO HENSLEY REPORTING VISIT TO MCR  
SITE ON 7-3-86

RECORD NUMBER 417  
07/10/86 CODE: INSP EPA  
R. MCCULLERS VISITED THE ROSE SITE AND TOOK  
PHOTOGRAPHS.

RECORD NUMBER 418  
07/10/86 CODE: INSP EPA  
TSCA INSPECTION OF CHARLES BUXTON. DATA  
ENFORCEMENT SENSITIVE.

RECORD NUMBER 419  
07/14/86 CODE: LET EPA Q  
DAVID TRIPP LETTER TO NEW SWYRNA BEACH, FL,  
UTILITIES COMMISSION REGARDING ETI/ROSE.

RECORD NUMBER 420  
07/15/86 CODE: PHONE BECK  
BECK (GENERATOR COUNSEL) TO HENRY ROMPAGE STATING  
THAT ROSE HAD BEEN SERVED ON BANKRUPTCY. ANDERSON  
DENIED. PLAINTIFFS SENDING REQUEST FOR PRODUCTION  
OF DOCUMENT, INTERROGATIONS, INSURANCE AND  
GENERATOR LIST. THEY PLAN TO DISPOSE WALTER AND  
JIM CAROLAN ASAP.

RECORD NUMBER 421  
07/15/86 CODE: INSP EPA  
TSCA INSPECTION OF MRS. DONNA THOMAS. DATA  
ENFORCEMENT SENSITIVE.

RECORD NUMBER 422  
07/18/86 CODE: INSP EPA  
TSCA INSPECTION UNDER AUTHORITY OF SEARCH WARRANT  
OF DWIGHT THOMAS'S PREMISES. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 423  
07/18/86 CODE: INSP EPA  
TSCA INSPECTION UNDER AUTHORITY OF SEARCH WARRANT  
OF PREMISES OF SHARON HAYS. DATA ENFORCEMENT  
SENSITIVE.



RECORD NUMBER 424  
07/23/86 CODE: LET EPA C  
LETTER FROM TRIPP TO ROMAN SUBMITTING COPIES.

RECORD NUMBER 425  
07/24/86 CODE: MEMO EPA S  
MEMO FROM CHARLES HENSLEY TO LEO ALDERMAN  
REGARDING PCB SPILL INVESTIGATION BY RICHARD  
NICKLE, REGION VII TATM (REPORT DATED 7/22/86).

RECORD NUMBER 426  
08/01/86 CODE: LET EPA D  
HENRY ROMPAGE'S LETTER RESENDING JULY 2, 1986,  
LETTER OF WAIVING CBI CLAIM.

RECORD NUMBER 427  
08/05/86 CODE: LET ROSE D  
LETTER REQUESTING COPIES OF THE THREE PERMIT  
APPLICATIONS AS PER OUR JULY 9, 1986, REVOCATION.

RECORD NUMBER 428  
09/15/86 CODE: PPR EPA R  
NEWSPAPER ARTICLE FROM KANSAS CITY STAR RE PCB  
INCINERATOR AT MCR-HOLDEN.

RECORD NUMBER 429  
09/26/86 CODE: LET OTHER  
ENSCO LETTER.

RECORD NUMBER 430  
/ / CODE: PHONE MARH  
UNDATED TCR. DISCUSSION BETWEEN HENRY ROMPAGE AND  
AARON MARCH ABOUT HIS PLANNED ACTION AGAINST ROSE,  
ETC.

RECORD NUMBER 431  
/ / CODE: MEMO EPA  
UNDATED MEMO FROM STEVE BUSCH TO ROBERT MORBY  
STATING ROSE, DBA PCB ELIMINATORS, DEMONSTRATED  
THEIR PCB OIL PROCESS ON JUNE 30, 1982.  
RECOMMENDED EPA PROCEED WITH APPROVAL PROCESS.  
DATE APPROXIMATE.

RECORD NUMBER 432  
/ / CODE: SUBPEONA E  
DRAFT PLAINTIFF RESONSE TO SUBPEONA RESPONDENT'S  
REFUSAL TO COMPLY WITH ADMINISTRATIVE SUBPEONA.

RECORD NUMBER 433  
/ / CODE: FS ROSE N  
AN UNDATED FACT SHEET REGARDING MARTHA C. ROSE  
CHEMICAL COMPANY - PCB DIVISION, NPDES NO.  
MO-0102997.

RECORD NUMBER 1  
/ / CODE:

RECORD NUMBER 2  
/ / CODE:

RECORD NUMBER 3  
11/11/11 CODE: PHONE MAYR  
MOVE OF AMERICAN STEEL TO ODESSA, MISSOURI -- FATE  
OF AMERICAN STEEL MATERIAL ON SITE.

RECORD NUMBER 4  
11/11/11 CODE: SUBPEONA E  
DRAFT PLAINTIFF RESONSE TO SUBPEONA RESPONDENT'S  
REFUSAL TO COMPLY WITH ADMINISTRATIVE SUBPEONA.

RECORD NUMBER 5  
11/11/11 CODE: MEMO EPA  
THIS UNDATED MEMO WAS FROM DAVID WAGONER TO MORRIS  
KAY REQUESTING THE JANUARY 10, 1984, DISPOSAL  
REQUEST TO DISPOSE OF PCB CAPACITOR CORES BE  
DENIED.

RECORD NUMBER 6  
11/11/11 CODE: PHONE MARH  
UNDATED TCR. DECISION BETWEEN HENRY ROMPAGE AND  
AARON MARCH ABOUT HIS PLANNED ACTION AGAINST ROSE,  
ETC.

RECORD NUMBER 7  
11/11/11 CODE: MEMO EPA  
UNDATED MEMO FROM STEVE BUSCH TO ROBERT MORBY  
STATING ROSE, DBA PCB ELIMINATORS, DEMONSTRATED  
THEIR PCB OIL PROCESS ON JUNE 30, 1982.  
RECOMMENDED EPA PROCEED WITH APPROVAL PROCESS.

RECORD NUMBER 8  
11/11/11 CODE: PHONE GEN.  
UNDATED TCRS FROM AUBURN, NEBRASKA, BOARD OF  
PUBLIC UTILITIES ABOUT 20 OR MORE CAPACITORS THAT  
THEY HAD SENT TO ROSE. REFERRED TO HENRY ROMPAGE.

RECORD NUMBER 9  
11/11/11 CODE: MAP ROSE  
MAP OF ROSE FACILITY.

RECORD NUMBER 10  
11/11/11 CODE: LET EPA R

UNDATED MEMO FROM LEO ALDERMAN TO TOPE STAFF  
REGARDING ROSE CONTACTS. RUBEN MC CULLERS,  
PRIMARY CONTACT, THEN LEO ALDERMAN, ART SPRATLIN.

RECORD NUMBER 11  
11/11/11 CODE: NOTE EPA M  
A LISTING OF POSSIBLE MITIGATING FACTORS FOR ROSE.

RECORD NUMBER 12  
11/11/11 CODE: MET EPA  
NOTES FROM 5/13/85 MEETING WITH WALT CAROLAN AND  
DWIGHT THOMAS WITH GEORGE BANG.

RECORD NUMBER 13  
11/11/11 CODE: FS ROSE N  
AN UNDATED FACT SHEET REGARDING MARTHA C. ROSE  
CHEMICAL COMPANY - PCB DIVISION, NPDES NO.  
MO-0102997.

RECORD NUMBER 14  
11/11/11 CODE: MEMO EPA  
UNDATED LISTING OF COMPLIANCE HISTORY OF MCR.

RECORD NUMBER 15  
11/11/11 CODE: LET ROSE  
UNDATED LETTER WITH FINANCIAL STATEMENT FOR PERIOD  
OF 8/31/82 THROUGH 8/31/83.

RECORD NUMBER 16  
11/11/11 CODE: LET EPA  
UNDATED DRAFT LETTER FROM MORRIS KAY TO WALT  
CAROLAN DENYING VARIANCES FROM THE TSCA STORAGE  
REQUIREMENT.

RECORD NUMBER 17  
12/18/79 CODE: LEAR/SIEGL  
SUBLEASE BETWEEN LESSOR TO W. C. CAROLAN CO., INC.

RECORD NUMBER 18  
03/03/80 CODE: HOLDEN  
CITY OF HOLDEN CONSENT TO SUBLEASE TO WALTER C.  
CAROLAN.

RECORD NUMBER 19  
06/16/81 CODE: LET EPA O  
LETTER FROM PCB ELIMINATORS TO WILLIAM RICE,  
DEPUTY REGIONAL ADMINISTRATOR, TRANSMITTING  
PROCESS DESIGN INFORMATION AND REQUESTING APPROVAL  
FOR CHEMICAL METHOD TO DISPOSE OF PCBs.

RECORD NUMBER 20  
06/30/81 CODE: MEMO EPA  
MEMO FROM LEO ALDERMAN TO ROBERT MOREY

ELIMINATORS TO WOLFGANG BRANDNER. THIS LETTER  
SUMMARIZES A JUNE 17, 1981, MEETING AND LISTS  
INFORMATION REQUIRED FOR AN APPLICATION.

RECORD NUMBER 21

07/27/81 CODE: MEMO EPA

HANDWRITTEN NOTE FROM WOLFGANG BRANDNER TO STEVE  
BUSCH STATING KANSAS CITY POWER AND LIGHT WAS  
APPROACHED BY PCB ELIMINATORS TO USE 100 PARTS PER  
MILLION OIL IN DEMONSTRATION. SUGGESTED USING A  
HIGHER CONCENTRATION.

RECORD NUMBER 22

07/28/81 CODE: PHONE OTHR

TELEPHONE CONVERSATION RECORD FROM WOLFGANG  
BRANDNER TO PCB ELIMINATORS CONFIRMING TEST OF OIL  
PROCESS FOR AUGUST 13, 1981.

RECORD NUMBER 23

08/04/81 CODE: MEMO EPA

MEMO FROM LEO ALDERMAN TO ROBERT MORBY  
TRANSMITTING A LETTER RECEIVED FROM PCB  
ELIMINATORS TO WOLFGANG BRANDNER DATED JULY 30,  
1981. THE LETTER CONFIRMS DATE OF PROCESS  
DEMONSTRATION FOR AUGUST 13, 1981.

RECORD NUMBER 24

08/05/81 CODE: LET EPA A

LETTER FROM REGION VI TO PCB ELIMINATORS STATING  
UNABLE TO ATTEND 8/13/81 DEMONSTRATION OF MOBILE  
UNIT

RECORD NUMBER 25

08/13/81 CODE: MEMO EPA

RECEIPT FOR TWO SAMPLES FROM PCB ELIMINATORS BY  
GENERAL TESTING LABORATORY, INC.

RECORD NUMBER 26

08/27/81 CODE: LET EPA O

LETTER FROM REGION VI TO PCB ELIMINATORS STATING  
ADDITIONAL INFORMATION IS REQUIRED FOR OPERATION  
OF FULL SCALE UNIT.

RECORD NUMBER 27

08/28/81 CODE: LET EPA O

LETTER FROM EPA TO PCB ELIMINATORS STATING  
ADDITIONAL INFORMATION IS REQUIRED FOR APPROVAL TO  
PROCESS PCBs ON A CONTINUING BASIS AS WELL AS A  
DEMONSTRATION IS REQUIRED WITH THE FULL-SCALE  
EQUIPMENT.

RECORD NUMBER 28

09/02/81 CODE: MEMO EPA

ANALYTICAL DATA REPORT FOR BENCH SCALE  
DEMONSTRATION AT PCB ELIMINATORS.

RECORD NUMBER 29  
09/15/81 CODE: PHONE LEVN  
TELEPHONE CONVERSATION RECORD FROM MARVIN FRYE TO  
MYRON LEVINE, KANSAS CITY STAR, REGARDING KANSAS  
CITY POWER & LIGHT AND PCB ELIMINATORS. PCB  
ELIMINATORS HAVE PERFORMED DEMO, AWAITING RESULTS.

RECORD NUMBER 30  
12/09/81 CODE: LET EPA 0  
LETTER FROM EPA TO HAWAIIAN ELECTRIC COMPANY  
REGARDING PCB ELIMINATORS APPROVAL.

RECORD NUMBER 31  
01/04/82 CODE: MEETING  
TELECOMMUNICATION RECORD TRANSMITTING MEETING  
NOTES FROM DENNIS DEGNER TO STEVE BUSCH. DEGNER  
MET WITH PCB ELIMINATORS. STATES COMPANY  
ORGANIZATION IS SHAKEY. COMPANY WANTS APPROVAL TO  
DISPOSE OF PCBs. ATTACHED THE LAB RESULTS FROM  
AUGUST 13, 1981, DEMONSTRATION.

RECORD NUMBER 32  
02/02/82 CODE: LET JEP  
LETTER OF AGREEMENT BETWEEN J.E. JESPER AND  
WALTER C. CAROLAN ESTABLISHING ROSE

RECORD NUMBER 33  
03/26/82 CODE: APPLICATION  
MCR APPLICATION (PCB ELIMINATORS) FOR OIL PROCESS

RECORD NUMBER 34  
04/19/82 CODE: PHONE COPS  
TELEPHONE CONVERSATION RECORD FROM BEN CASEY TO  
EPA. CASEY IS WITH THE KANSAS CITY POLICE  
DEPARTMENT. PCB ELIMINATORS WERE BEING  
INVESTIGATED BECAUSE PERSONS INVOLVED HAVE SHADY  
BACKGROUND.

RECORD NUMBER 35  
06/15/82 CODE: PHONE MCR  
TELEPHONE CONVERSATION RECORD BETWEEN STEVE BUSCH  
AND BOSCH REQUESTING DEMO OF OIL PROCESSING ON  
JUNE 30, 1982, IN HOLDEN, MISSOURI.

RECORD NUMBER 36  
06/22/82 CODE: LET EPA 0  
LETTER FROM PCB ELIMINATORS TO JOHN FRANKE, EPA  
REGION VII REGIONAL ADMINISTRATOR, PROVIDING  
ADDITIONAL INFORMATION ON THE STRIPPER COLUMN AND  
EFFLUENTS FROM THE PCB OIL PROCESS.

RECORD NUMBER 37  
07/01/82 CODE: LET EPA 0  
LETTER FROM PCB ELIMINATORS TO EPA DESCRIBING  
ANALYSIS OF PCB OIL SAMPLE COLLECTED PRIOR TO JUNE  
30, 1982. DEMONSTRATION.

RECORD NUMBER 38  
07/12/82 CODE: MEMO EPA  
MEMO FROM ROBERT MORBY TO MIKE SANDERSON STATING  
THAT THE KANSAS CITY POLICE DEPARTMENT IS  
INVESTIGATING PCB ELIMINATORS, BUT APPROVAL  
RECOMMENDATIONS SHOULD BE MADE FROM THE TECHNICAL  
REVIEW.

RECORD NUMBER 39  
08/11/82 CODE: PHONE LAB  
TELEPHONE CONVERSATION RECORD BETWEEN STEVE  
BUSCHAND BOB GREENALL TRANSMITTING VERBAL RESULTS  
OF ANALYSIS FOR SAMPLES COLLECTED AT PCB  
ELIMINATORS.

RECORD NUMBER 40  
08/13/82 CODE: LET ROSE A  
LETTER FROM MARTHA C. ROSE TO EPA STATING  
INSTALLATION OF FILTRATION EQUIPMENT IS COMPLETE  
PER AUGUST 11 CONVERSATION.

RECORD NUMBER 41  
08/13/82 CODE: MEMO EPA  
TRANSMITTAL OF LABORATORY DATA FOR SAPLES  
COLLECTED JUNE 30, 1982, AT MARTHA C. ROSE.

RECORD NUMBER 42  
08/25/82 CODE: APPROVAL  
INTERIM APPROVAL TO MARTHA C. ROSE, DBA PCB  
ELIMINATORS, TO PROCESS PCB MINERAL OIL.  
EFFECTIVE SEPTEMBER 15, 1982, TO MARCH 15, 1983.

RECORD NUMBER 43  
08/30/82 CODE: LET ROSE A  
LETTER REQUESTING NAME CHANGE TO ROSE, OUTLINE OF  
CLOSURE PLAN AND QA/QC PLAN, AND PROCEDURE TO GET  
COMMERCIAL APPROVAL

RECORD NUMBER 44  
09/02/82 CODE: APPLICATION  
APPLICATION TO PROCESS PCB CAPACITORS

RECORD NUMBER 45  
09/02/82 CODE: APPLICATION  
ROSE CAPACITOR APPLICATION.

RECORD NUMBER 46  
09/23/82 CODE: LET ROSE A  
LETTER FROM MARTHA C. ROSE TO WILLIAM RICE, DEPUTY  
REGIONAL ADMINISTRATOR FOR REGION VII, GIVING  
30-DAY NOTIFICATION OF PROCESSING OF PCBs (OIL).

RECORD NUMBER 47

ROSE LETTER REQUESTING ANALYTICAL PROCEDURES

RECORD NUMBER 48

10/18/82 CODE: APPROVAL

INTERIM APPROVAL TO MARTHA C. ROSE TO PROCESS PCB  
MINERAL OIL. EFFECTIVE SEPTEMBER 15, 1982 TO  
MARCH 15, 1983 (SEE AUGUST 25, 1982 APPROVAL).  
THIS APPEARS TO BE A NAME CHANGE.

RECORD NUMBER 49

10/19/82 CODE: LET EPA A

EPA LETTER TO ROSE IN RESPONSE TO ROSE LETTER OF  
AUGUST 30, 1982 (ISSUED APPROVAL WITH ROSE NAME  
INSTEAD OF PCB ELIMINATORS).

RECORD NUMBER 50

11/19/82 CODE: LETTER TO

LETTER TO ROSE DENYING CAPACITOR APPROVAL  
(SEPTEMBER 2, 1982, SUBMISSION).

RECORD NUMBER 51

11/29/82 CODE: MEMO EPA

MEMO FROM BILL KEFFER, EPA REGION VII LABORATORY,  
TO ROBERT MORBY. ANALYTICAL RESULTS FOR SAMPLES  
COLLECTED BY STEVE BUSCH SEPTEMBER 8-29, 1982.

RECORD NUMBER 52

12/02/82 CODE: APPLICATION

REAPPLICATION TO PROCESS PCB CAPACITORS.

RECORD NUMBER 53

12/02/82 CODE: APPLICATION

ROSE RESUBMITTED APPLICATION FOR CAPACITORS  
(INITIAL SUBMISSION SEPTEMBER 2, 1982).

RECORD NUMBER 54

12/14/82 CODE: LET ROSE A

SUBMITTED CLOSURE AND QUALITY ASSURANCE PLANS -  
REQUESTED IN INTERIM OIL APPROVAL DATED SEPTEMBER  
15, 1982.

RECORD NUMBER 55

12/14/82 CODE: APPLICATION

LETTER FROM MARTHA C. ROSE TO EPA REQUESTING  
AMENDMENT OF INTERIM APPROVAL (OIL) TO INCLUDE GAS  
CONDENSATE. INCLUDES CHARACTERIZATION OF GAS  
CONDENSATE.

RECORD NUMBER 56

01/16/83 CODE: LET ROSE P

LETTER FROM ROSE TO EPA REQUESTING VARIANCE FROM  
THE 1-YEAR DISPOSAL RULE.

RECORD NUMBER 57

02/08/83 CODE: MEMO EPA

APPROVING ROSE CAPACITOR PROCESS AND INDICATES  
WHERE DECONTAMINATION LEVEL CAME FROM.

RECORD NUMBER 58  
02/09/83 CODE: APPLICATION  
LETTER FROM MARTHA C. ROSE TO EPA PROPOSING TO  
DISPOSE OF PCB TRANSFORMERS.

RECORD NUMBER 59  
02/16/83 CODE: APPROVAL  
INTERIM CAPACITOR APPROVAL (4-1-83 TO 10-1-83).

RECORD NUMBER 60  
02/17/83 CODE: LET ROSE A  
CLOSURE PLANS

RECORD NUMBER 61  
02/22/83 CODE: LET EPA A  
LETTER FROM EPA TO MARTHA C. ROSE, REQUESTING  
ADDITIONAL INFORMATION REGARDING THE FEBRUARY 9,  
1983, APPLICATION TO DISPOSE OF PCB TRANSFORMERS.

RECORD NUMBER 62  
02/24/83 CODE: LET EPA A  
LETTER FROM LYNN HARRINGTON, RCRA, TO MCR  
REQUESTING ADDITIONAL INFORMATION ON DECEMBER 14,  
1982, REQUEST TO PROCESS GAS CONDENSATE.

RECORD NUMBER 63  
03/02/83 CODE: LET ROSE A  
SUMMARY OF PCB ACTIVITY TO SATISFY CONDITION OF  
OIL PROCESSING APPROVAL. FROM MARTHA C. ROSE TO  
STEVE BUSCH.

RECORD NUMBER 64  
03/03/83 CODE: MEMO EPA  
MEMO FROM DAVID WAGONER TO MORRIS KAY REQUESTING  
ISSUING OF FINAL APPROVAL TO MARTHA C. ROSE TO  
DESTROY PCB OIL.

RECORD NUMBER 65  
03/10/83 CODE: LET ROSE A  
LETTER TO LYNN HARRINGTON, RCRA, FROM MCR  
TRANSMITTING FLOW DIAGRAM AND DRAWINGS OF  
PROCESSING UNIT FOR GAS CONDENSATE. THIS IS IN  
RESPONSE TO A FEBRUARY 24, 1983, LETTER FROM EPA.

RECORD NUMBER 66  
03/10/83 CODE: APPROVAL  
APPROVAL TO PROCESS PCB MINERAL OIL UP TO 10,000  
PARTS PER MILLION. EFFECTIVE MARCH 15, 1983 TO  
MARCH 15, 1986.

RECORD NUMBER 67



PCB TRANSFORMERS IN  
IN RESPONSE TO FEBRUARY 23, 1983, LETTER FROM EPA  
REQUESTING ADDITIONAL INFORMATION.

RECORD NUMBER 68  
04/18/83 CODE: LET EPA A

RECORD NUMBER 69  
04/18/83 CODE: LET EPA A  
LETTER TO ROSE TELLING THEM HQ APPROVING MOBILES

RECORD NUMBER 70  
05/12/83 CODE: LET ROSE A  
LETTER TO DAVID WAGONER FROM MARTHA C. ROSE  
CHEMICAL COMPANY REQUESTING HIGHER PRIORITY BE  
GIVEN TO GAS CONDENSATE PROPOSAL DATED DECEMBER  
14, 1982.

RECORD NUMBER 71  
05/31/83 CODE: LET EPA A  
LETTER FROM DAVID WAGONER, EPA, TO MCR IN RESPONSE  
TO MAY 12, 1983, LETTER FROM MCR. THIS LETTER  
REQUESTS ADDITIONAL INFORMATION REGARDING GAS  
CONDENSATE PROCESS.

RECORD NUMBER 72  
06/22/83 CODE: PHONE MCR  
TCR BETWEEN STEVE BUSCH AND MCR. MCR REQUESTED  
STATUS OF PCB TRANSFORMER APPLICATION.

RECORD NUMBER 73  
06/23/83 CODE: LET ROSE A  
JUNE 23, 1983, LETTER WAS RECEIVED BY EPA ON JUNE  
30, 1983. IT WAS THE CLOSURE PLANS.

RECORD NUMBER 74  
06/30/83 CODE: APPLICATIO  
A DESCRIPTION OF PROCESS EQUIPMENT AND DISPOSAL  
PROCEDURES OF PCB GAS CONDENSATE.

RECORD NUMBER 75  
07/18/83 CODE: LET EPA A  
LETTER TO WALTER CAROLAN GRANTING APPROVAL TO  
PROCESS PCB TRANSFORMERS FOR R&D PURPOSES,  
APPROVAL EFFECTIVE 8/1/83 UNTIL 2/1/84.

RECORD NUMBER 76  
07/18/83 CODE: LET ROSE A  
LETTER TO MORRIS KAY, NOTIFICATION OF INTENT TO  
BEGIN PROCESSING PCB TRANSFORMERS FOR R&D,  
BEGINNING 8/18/83.

RECORD NUMBER 77  
07/25/83 CODE: LET ROSE A  
LETTER TO MORRIS KAY FROM MCR REQUESTING A HIGHER  
PRIORITY FOR REVIEW OF CONDENSATE PROPOSAL DATED  
DECEMBER 14, 1982.

RECORD NUMBER 78  
08/05/83 CODE: LET EPA O  
LETTER FROM LYONS DIECASTING STATING ALL  
DIECASTING MACHINES ARE LESS THAN 50 PPM. ARE  
AWAITING CERTIFICATE OF DESTRUCTION FROM MCR FOR  
FLUIDS.

RECORD NUMBER 79  
08/12/83 CODE: LET EPA A  
RESPONSE TO ROSE LETTER OF JULY 25, 1983, SAYING  
EPA WILL ATTEMPT TO EXPEDITE REVIEW OF RECENT  
APPROVAL REQUEST.

RECORD NUMBER 80  
09/14/83 CODE: LET ROSE A  
ROSE LETTER TO MORRIS KAY, CAPACITOR PROCESSING  
SUMMARY AS REQUIRED IN INTERIM APPROVAL.

RECORD NUMBER 81  
09/26/83 CODE: LET ROSE A  
LETTER TO MORRIS KAY (ATTENTION STEVE BUSCH)  
REGARDING FORMAL APPLICATION FOR APPROVAL FOR  
CAPACITOR CORE MATERIAL REDUCTION METHOD.

RECORD NUMBER 82  
09/30/83 CODE: LET ROSE O  
LETTER FROM ROSE TO REPRESENTATIVE TOM COLEMAN,  
MISSOURI, REQUESTING GREATER THAN ONE-YEAR TIME  
FRAME FOR DISPOSAL.

RECORD NUMBER 83  
09/30/83 CODE: LET EPA A  
LETTER TO MARTHA C. ROSE FROM LYNN HARRINGTON,  
RCRA, STATING DEFICIENCIES IN JUNE 30, 1983,  
APPLICATION TO DISPOSE OF PCB CONTAMINATED GAS  
PIPELINE CONDENSATE.

RECORD NUMBER 84  
09/30/83 CODE: LET ROSE O  
LETTER FROM MCR TO REP. TOM COLEMAN STATING EPA  
ISSUED RULES IN POLICY STATEMENTS 6-PCB-1 THROUGH  
6-PCB-7 WITHOUT A HEARING. ATTACHED IS 10-12-83  
LETTER TO COLEMAN SUMMARIZING 10-4-83 MEETING  
BETWEEN COLEMAN'S STAFF AND MCR

RECORD NUMBER 85  
10/11/83 CODE: LET ROSE O  
ROSE REPORTING SPILL ON 10-7-83 & CLEANUP ACTIVITY

10/12/83 CODE: LET ROSE O  
ROSE LETTER TO REPRESENTATIVE TOM COLEMAN,  
MISSOURI, MENTIONING SLOW REVIEW BY EPA AND USING  
THIS AS REASON TO EXTEND ONE-YEAR STORAGE.

RECORD NUMBER 87  
10/27/83 CODE: MEMO EPA  
MEMO FROM KEFFER TO SKOWRONSKI TRANSMITTING TAT  
MEMO ON RESPONSE TO INCIDENT IN HOLDEN REGARDING A  
GASOLINE STORAGE TANK.

RECORD NUMBER 88  
10/28/83 CODE: MEMO EPA  
MEMO FROM BOB KLEOPFER TO BILL KEFFER TRANSMITTING  
RESULTS OF A SLUDGE SAMPLE FROM A GASOLINE STORAGE  
TANK IN HOLDEN, MO.

RECORD NUMBER 89  
11/03/83 CODE: LET CONGRS  
LETTER FROM SENATOR EAGLETON SAYING ROSE IS  
CONCERNED ABOUT REVIEW TIME FRAME AND HE WOULD  
LIKE SOME INDICATION OF THE REVIEW PROCESS STEPS  
THAT MUST BE TAKEN.

RECORD NUMBER 90  
11/07/83 CODE: APPROVAL  
COMMERCIAL APPROVAL FOR CAPACITORS (OCTOBER 15,  
1983 TO OCTOBER 15, 1986).

RECORD NUMBER 91  
11/10/83 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING MODIFICATION TO  
CAPACITOR LINE (CUT CORE MATERIAL).

RECORD NUMBER 92  
11/14/83 CODE: APPLICATION  
MODIFICATION OF APPROVAL TO PROCESS PCB CAPACITOR  
CORES.

RECORD NUMBER 93  
11/14/83 CODE: APPLICATION  
APPLICATION FOR MODIFICATION OF CAPACITOR APPROVAL  
(CORE MATERIAL PROCESSING).

RECORD NUMBER 94  
11/16/83 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING EXTENSION TO ONE  
YEAR STORAGE REQUIREMENTS

RECORD NUMBER 95  
11/16/83 CODE: LET ROSE P  
LETTER FROM ROSE TO KAY REQUESTING VARIANCE TO ONE  
YEAR STORAGE REQUIREMENT

RECORD NUMBER 96

LETTER FROM HEADQUARTERS TO REPRESENTATIVE TOM COLEMAN, MISSOURI, EXPLAINING ONE-YEAR TIME PERIOD FOR DISPOSAL AND STATING WILL NOT INCREASE FOR DISPOSAL FACILITIES.

RECORD NUMBER 97  
12/02/83 CODE: LET ROSE D  
LETTER TO SENATOR EAGLETON, MISSOURI, IN RESPONSE TO NOVEMBER 3, 1983, INQUIRY ON BEHALF OF ROSE AS TO REASON TAKING SO LONG ON APPROVALS.

RECORD NUMBER 98  
12/02/83 CODE: LET CONG  
LETTER FROM MOORE(HQ) TO REP. THOMAS COLEMAN IN REGARD TO MCR'S REQUEST FOR VARIANCE OF ONE YEAR STORAGE REQUIREMENT.

RECORD NUMBER 99  
12/05/83 CODE: LET CONG  
LETTER FROM IKE SKELTON TO KAY REQUESTING REVIEW OF MCR'S REQUEST FOR VARIANCE OF ONE YEAR STORAGE REQUIREMENT

RECORD NUMBER 100  
12/13/83 CODE: LET EPA C  
LETTER TO MCR IN RESPONSE TO MCR LETTER TO SENATOR THOMAS EAGLETON, MISSOURI, DATED 11-28-83 REGARDING VARIANCE TO 1-YEAR DISPOSAL REQUIREMENTS.

RECORD NUMBER 101  
12/14/83 CODE: LET ROSE A  
LETTER TO ROSE FOR MODIFICATION TO CAPACITOR APPROVAL (CAPACITOR CORE CUTTING).

RECORD NUMBER 102  
12/14/83 CODE: APPROVAL  
APPROVAL GRANTED FOR RESEARCH AND DEVELOPMENT (R & D) ON FIVE PCB CAPACITOR CORES. EFFECTIVE DECEMBER 15, 1983, UNTIL JUNE 16, 1984.

RECORD NUMBER 103  
12/14/83 CODE: MEMO EPA  
MEMO FROM DAVID WAGONER TO MORRIS KAY REQUESTING THAT APPROVAL BE GRANTED FOR A PROCESS CHANGE MAKING CAPACITOR CORES MORE AMENABLE TO INCINERATION.

RECORD NUMBER 104  
12/19/83 CODE: APPLICATIN  
REQUEST FOR R&D APPROVAL OF GAS CONDENSATE PROCESS.

RECORD NUMBER 105  
12/28/83 CODE: LET CONG  
EPA LETTER TO REP. IKE SKELTON REGARDING VARIANCE

RECORD NUMBER 106  
12/28/83 CODE: LET CONG  
EPA LETTER TO REP. IKE SKELTON REGARDING ROSE  
REQUEST FOR VARIANCE FROM ONE YEAR STORAGE  
REQUIRMENT.

RECORD NUMBER 107  
12/29/83 CODE: LET ROSE A  
LETTER TO MORRIS KAY: ATTENTION STEVE BUSCH.  
RESPONSE TO CONDITION OF R & D APPROVAL TO REPORT  
PCB TRANSFORMERS PROCESSED SUMMARY OF PCB  
TRANSFORMERS PROCESSED - 9/1/83 - 12/31/83.

RECORD NUMBER 108  
01/09/84 CODE: LET ROSE H  
ROSE LETTER TO HEADQUARTERS REQUESTING SIMULATED  
IN-SERVICE FOR TRANSFORMERS

RECORD NUMBER 109  
01/10/84 CODE: LET ROSE P  
ROSE LETTER TO EPA REQUESTING ABILITY TO BLEND  
DOWN HIGH PARTS PER MILLION (PPM) OIL TO PROCESS.

RECORD NUMBER 110  
01/10/84 CODE: LET ROSE A  
LETTER FROM MARTHA C. ROSE TO MORRIS KAY  
REQUESTING 80,000 - 90,000 LBS. OF CAPACITOR CORES  
BE AUTHORIZED FOR PROCESSING TO SCALE UP  
EQUIPMENT. THE 5 CORES AUTHORIZED IN THE R & D  
APPROVAL ARE NOT ADEQUATE.

RECORD NUMBER 111  
01/10/84 CODE: LET ROSE A  
DWIGHT THOMAS'S LETTER TO EPA REQUESTING FORMAL  
APPROVAL TO BLEND OILS GREATER THAN 10,000 PPM  
PCBS FOR USE AS REACTOR FEED STOCK.

RECORD NUMBER 112  
01/24/84 CODE: LET EPA A  
LETTER TO ROSE IN RESPONSE TO JANUARY 10, 1984,  
LETTER. DENY ADDITIONAL 80,000 - 90,000 LBS. FOR  
CAPACITOR CORE R & D.

RECORD NUMBER 113  
01/26/84 CODE: PHONE ROSE  
TCR FROM EPA TO DWIGHT THOMAS (ROSE). MR. THOMAS  
RECEIVED A JANUARY 24, 1984, LETTER REQUESTING  
MORE INFORMATION AND WANTED TO KNOW WHAT TYPE OF  
INFORMATION. THE INFORMATION REQUESTED IS FOR  
CHARACTERIZATION OF EACH WASTE AND/OR PROCESS  
STREAM.

RECORD NUMBER 114  
01/30/84 CODE: LET ROSE A  
LETTER FROM DWIGHT THOMAS TO MORRIS KAY IN

CHARACTERIZATION OF PROCESS STREAMS IN CAPACITOR  
CORE PROCESS.

RECORD NUMBER 115  
02/01/84 CODE: APPLICATIN  
REQUEST FOR INTERIM APPROVAL TO PROCESS PCB  
TRANSFORMERS.

RECORD NUMBER 116  
02/02/84 CODE: LET EPA A  
EPA LETTER TO MARTHA C. ROSE SENDING APPENDIX FROM  
EPA CONTRACTOR DRAFT REPORT. INFORMATION TO HELP  
THEIR TRANSFORMER/CAPACITOR OPERATIONS.

RECORD NUMBER 117  
02/14/84 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING REVIEW STATUS OF THE  
GAS CONDENSATE APPLICATION, CAPACITOR CORES, AND  
PCB TRANSFORMERS

RECORD NUMBER 118  
02/17/84 CODE: LET ROSE A  
ROSE LETTER TO MORRIS KAY COMPLAINING ABOUT SLOW  
REVIEW, REQUESTING ADDITIONAL CAPACITOR MATERIAL  
FOR R AND D

RECORD NUMBER 119  
02/23/84 CODE: LET EPA A  
EPA LETTER TO ROSE GIVING ESTIMATED DATES FOR  
REVIEW COMPLETION ON GAS CONDENSATE, CAPACITOR  
CORE, AND PCB TRANSFORMER APPLICATIONS (REFERENCE  
ROSE LETTER OF FEBRUARY 14, 1984).

RECORD NUMBER 120  
02/27/84 CODE: LET ROSE A  
LETTER FROM MARTHA C. ROSE TO LYNN HARRINGTON  
REGARDING A FEBRUARY 23, 1984, LETTER ADVISING THE  
STATUS OF VARIOUS APPLICATIONS. THIS LETTER  
STATES A LETTER DATED JANUARY 30 WAS SENT TO EPA  
ON JANUARY 30, FEBRUARY 16, AND FEBRUARY 22  
REGARDING CAPACITOR CORE TREATMENT. THE SAME  
LETTER WAS SENT THREE TIMES BEFORE ACKNOWLEDGED AS  
BEING RECEIVED.

RECORD NUMBER 121  
03/05/84 CODE: MEMO EPA  
MEMO FROM STEVE BUSCH TO MIKE SANDERSON SITING  
VIOLATIONS OF CAPACITOR APPROVAL (NOVEMBER 7,  
1983) CONDITION NOS. 6 AND 14. HE SUGGESTED  
MAXIMUM ENFORCEMENT ACTION AND TERMINATION OF  
APPROVAL, UNLESS ALL MATERIAL DISPOSED OF WITHIN  
45 DAYS.

RECORD NUMBER 122  
03/05/84 CODE: MEMO EPA  
MEMO FROM WMBR TO AWCM ALLEGING PERMIT AND  
REGULATORY VIOLATIONS BY ROSE

RECORD NUMBER 123

03/06/84 CODE: LET HQ

LETTER FROM HEADQUARTERS TO ROSE STATING READY TO APPROVE SIMULATED IN-SERVICE FOR TRANSFORMERS, BUT NEED MORE INFORMATION

RECORD NUMBER 124

03/06/84 CODE: LET EPA PC

LETTER FROM DON CLAY, EPA HQ, IN RESPONSE TO ROSE'S LETTER OF 2/7/84 WHICH REQUESTED APPROVAL UNDER CURRENT PCB REGULATIONS TO SIMULATE LOAD CONDITIONS OF IN-SERVICE USE TO RECLASSIFY ELECTRICAL TRANSFORMERS CONTAINING MORE THAN 500 PPM PCBs.

RECORD NUMBER 125

03/16/84 CODE: MEMO EPA

MEMO FROM DAVID WAGONER TO MORRIS KAY RECOMMENDING ROSE'S CAPACITOR CORE REDUCTION R & D BE DENIED.

RECORD NUMBER 126

03/20/84 CODE: LET EPA A

EPA LETTER FROM MORRIS KAY TO MARTHA C. ROSE GIVING ESTIMATES OF COMPLETION DATES FOR REVIEW OF GAS CONDENSATES, PCB TRANSFORMER, CAPACITOR CORE APPLICATIONS (REFERENCE ROSE LETTER OF FEBRUARY 17, 1984). AUTHORIZED ADDITIONAL 80,000 LBS. FOR CAPACITOR CORE R&D.

RECORD NUMBER 127

03/23/84 CODE: PHONE HQ

TCR FROM EPA-REGION VII TO GLEN KUNTZ-EPA HQ REGARDING ROSE R & D EXTENSION LETTER OF MARCH 20, 1984, REQUESTING 80,000 LBS. OF CORE MATERIAL. THIS TCR RECOMMENDS NOT ISSUING.

RECORD NUMBER 128

03/26/84 CODE: CIVIL EPA

EPA ISSUED AN ADMINISTRATIVE CIVIL COMPLAINT TO ROSE FOR A PENALTY OF \$30,000 BECAUSE OF IMPROPER STORAGE OF PCBs (NO SPCC PLAN) AND HAD FAILED TO MAKE THE STORAGE AREA BASED ON THE NOVEMBER 3 AND 4, 1983, INSPECTION OF ROSE'S FACILITY IN HOLDEN.

RECORD NUMBER 129

03/28/84 CODE: LET EPA A

AN UNSIGNED, UNDATED LETTER (PINK COPY IN FILE) TYPED ON MARCH 28, 1984, CHANGING QUANTITY OF CORES MATERIAL AUTHORIZED TO PROCESS IN THE MARCH 20, 1984, LETTER FROM MORRIS KAY TO MARTHA C. ROSE FROM 80,000 LBS. TO 8,000 LBS. ALSO REQUESTED ADDITIONAL INFORMATION.

RECORD NUMBER 130

04/03/84 CODE: LET EPA A

COMMENT LETTER FROM DAVID WAGONER TO MCR

D REQUEST TO PROCESS PCB GAS CONDENSATE (PROCESS  
ORIGINALLY PROPOSED 12/14/82).

RECORD NUMBER 131

04/11/84 CODE: MEETING

SETTLEMENT CONFERENCE BETWEEN ROSE AND EPA  
[ROMPAGE AND FRYE] ON VII-84-T-181. ROSE NOW HAS  
INCINERATION CONTRACTS AND A HEADQUARTERS  
RECLASSIFICATION APPROVAL. WITH THOSE THEY CAN GET  
INTO COMPLIANCE IN SIX MONTHS. REVIEWED MARKING  
AND SPCC VIOLATION. ROSE AGREED TO FENCE THE AREA.  
VERBAL AGREEMENT ON TERMS OF SETTLEMENT.

RECORD NUMBER 132

04/19/84 CODE: LET EPA A

LETTER TO WALTER CAROLAN REFUSING REQUEST FOR  
INTERIM APPROVAL TO PROCESS PCB TRANSFORMERS.

RECORD NUMBER 133

04/25/84 CODE: APPLICATIN

REQUEST FOR INTERIM APPROVAL TO PROCESS PCB  
TRANSFORMERS.

RECORD NUMBER 134

05/15/84 CODE: MEMO EPA S

AN INVESTIGATION REPORT OF A CITIZEN'S COMPLAINT  
REGARDING CAROLAN COMPANY, HOLDEN, MO.

RECORD NUMBER 135

05/17/84 CODE: LET EPA A

LETTER FROM LYNN HARRINGTON TO MARTHA C. ROSE  
DESCRIBING INFORMATION TO BE INCLUDED IN A  
COMMERCIAL APPROVAL REQUEST.

RECORD NUMBER 136

05/17/84 CODE: LET EPA C

CAROLAN LETTER TO REGIONAL HEARING CLERK ENCLOSING  
ANSWER AND REQUEST FOR HEARING ON VII-84-T-181.

RECORD NUMBER 137

05/17/84 CODE: CIVIL

ROSE'S ANSWER TO DOCKET NO. VII-84-T-181.

RECORD NUMBER 138

05/18/84 CODE: LET ROSE A

ROSE LETTER TO EPA REQUESTING SIX-MONTH EXTENSION  
TO R AND D

RECORD NUMBER 139

05/18/84 CODE: LET EPA C

REGIONAL HEARING CLERK TO CHIEF ALJ FINCH  
ENCLOSING COPY OF ANSWER AND REQUEST FOR HEARING,  
VII-84-T-181.

RECORD NUMBER 140



RECORD NUMBER 141  
05/30/84 CODE: LET EPA C  
HEADQUARTERS CONCURS ON REDUCTION OF PENALTY  
CORES INCREASED FROM  
GREATER THAN 40 PERCENT, VII-84-T-181.

RECORD NUMBER 142  
06/11/84 CODE: LET EPA C  
LETTER FROM HENRY ROMPAGE TO W. CAROLAN, ENCLOSING  
COPY OF CONSENT AGREEMENT.

RECORD NUMBER 143  
06/12/84 CODE: LET EPA C  
CHIEF ALJ. FINCH DESIGNATES ALJ MARVIN JONES AS  
HEARING OFFICER, VII-84-T-181.

RECORD NUMBER 144  
06/14/84 CODE: LET EPA C  
ALJ JONES TO ROSE/CNSL, RE SETTLEMENT OF CASE AND  
EXCHANGE OF INFORMATION, VII-84-T-181.

RECORD NUMBER 145  
06/22/84 CODE: LET EPA C  
W. CAROLAN TO REGIONAL HEARING CLERK, ENCLOSING  
EXECUTED CONSENT AGREEMENT, VII-84-T-181 WITH  
PAYMENT OF \$7,000.

RECORD NUMBER 146  
06/26/84 CODE: LET EPA C  
ROMPAGE TO ALJ JONES RE CONSENT AGREEMENT MAILED  
TO RESPONDENT ON 6/24/84.

RECORD NUMBER 147  
07/02/84 CODE: MEMO EPA  
MEMO FROM ROBERT MORBY TO MIKE SANDERSON REFERRING  
CALLS FOR COMPLIANCE MONITORING ABOUT THE  
LANDFILLING OF CAPACITOR CORES. MARTHA C. ROSE'S  
APPROVALS ALLOW LANDFILLING OF MATERIAL > .2 MG/KG  
PCB. MARTHA C. ROSE WON BIDS BASED ON THEIR  
ABILITY TO LANDFILL CORE MATERIALS BUT REPORTED TO  
EPA THE MATERIAL IS PCB AT 500-20,000 PARTS PER  
MILLION.

RECORD NUMBER 148  
07/02/84 CODE: APPROVAL  
APPROVAL TO PROCESS PCB TRANSFORMERS. EFFECTIVE  
JULY 1, 1984, TO JULY 1, 1987.

RECORD NUMBER 149  
07/02/84 CODE: LET EPA C  
CONSENT AGREEMENT AND FINAL ORDERSIGNED BY MORRIS  
KAY, VII-84-T-181.

RECORD NUMBER 150  
07/02/84 CODE: CONSENT  
CONSENT AGREEMENT BETWEEN ROSE AND EPA SETTLING  
DOCKET NO. VII-84-T-181. RESPONDENT AGREED TO PAY  
\$7,000 IMMEDIATELY AND THE REMAINDER IF HE FAILED  
TO PROPERLY DISPOSE OF PCB CAPACITOR CORE MATERIAL  
BY 5/15/84, ALL PCB TRANSFORMERS SUBJECT TO THE  
1/1/84 DATE BY 8/31/84 AND DOCUMENT BY 9/5/84.

RECORD NUMBER 151  
07/03/84 CODE: LET ROSE A  
LETTER TO MORRIS, 30-DAY ADVANCE NOTIFICATION OF  
ROSE'S INTENT TO BEGIN PCB TRANSFORMER PROCESSING.

RECORD NUMBER 152  
07/03/84 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSED COPY OF EXECUTED  
CONSENT AGREEMENT AND FINAL ORDER, VII-84-T-181.

RECORD NUMBER 153  
07/12/84 CODE: LET ROSE A  
LETTER TO EPA FROM WALTER CAROLAN, MARTHA C. ROSE  
CHEMICAL COMPANY, REQUESTING A MEETING WITH EPA  
REGARDING APPROVAL FOR CAPACITOR CORES. EXPRESSED  
CONCERN THAT THE DEPARTURE OF STEVE BUSCH WILL  
SLOW REVIEW OF THEIR APPLICATION.

RECORD NUMBER 154  
07/17/84 CODE: PHONE PRMT  
TELEPHONE CONVERSATION RECORD FROM DENNIS A.  
DEGNER TO MYRON LEVIN, KANSAS CITY STAR. TOLD HIM  
ROSE DID NOT HAVE TO SUBMIT PERIODIC RECORDS.  
CAPACITOR COMPONENTS MUST BE DISPOSED OF AT  
APPROVED FACILITY.

RECORD NUMBER 155  
08/01/84 CODE: EPA LET A  
EPA LETTER TO ROSE IN RESPONSE TO JULY 12, 1984,  
LETTER. DENY 6-MONTH EXTENSION FOR R AND D  
CAPACITOR CORE REDUCTION.

RECORD NUMBER 156  
08/01/84 CODE: MEMO EPA  
MEMO FROM DAVID WAGONER TO MORRIS KAY REGARDING  
6-MONTH EXTENSION FOR DECEMBER 14, 1983, R & D  
APPROVAL TO PROCESS CAPACITOR CORES. THIS MEMO  
REQUESTS THE EXTENSION BE DENIED.

RECORD NUMBER 157  
08/07/84 CODE: INSP EPA  
INSPECTION OF ROSE BY TOPE. FOUND IMPROPER  
STORAGE, MARKING, RECORDKEEPING AND DISPOSAL.  
FOUND VIOLATIONS OF ALL THREE DISPOSAL APPROVALS.

RECORD NUMBER 158

08/24/84 CODE: LET ROSE A  
LETTER REFERENCING 08/22/84 MEETING WITH FLEER  
REQUESTING MODIFICATION OF CAPACITOR LINE AND OIL  
DETOX LINE

RECORD NUMBER 159  
08/24/84 CODE: LET ROSE M  
FOLLOWUP TO MEETING OF 8/22/84 EXPLAINING PCB  
PROCESS MODIFICATION.

RECORD NUMBER 160  
08/30/84 CODE: LET EPA A  
EPA LETTER TO ROSE STATING MAY NOT BLEND DOWN HIGH  
CONCENTRATION OF OIL SO IT CAN BE PROCESSED.

RECORD NUMBER 161  
08/30/84 CODE: LET EPA A  
LEO ALDERMAN TO WALTER CAROLAN RE "BLEND DOWN" OF  
PCB LIQUIDS BY PCB DISPOSAL FACILITIES, PER HQ  
RESPONSE.

RECORD NUMBER 162  
08/31/84 CODE: LET ROSE C  
LETTER TO EPA FROM ROSE TO DOCUMENT COMPLIANCE  
WITH VII-84-T-181.

RECORD NUMBER 163  
09/07/84 CODE: LET ROSE C  
ROSE LETTER TO EPA WITH REVISED RECORDKEEPING  
FORMS AS DISCUSSED ON SEPTEMBER 5, 1984.

RECORD NUMBER 164  
09/07/84 CODE: LET EPA C  
LETTER TO RUBEN MC CULLERS TRANSMITING  
RECORDKEEPING FORMS AS DISCUSSED IN 9/5/84  
MEETING.

RECORD NUMBER 165  
10/01/84 CODE: INSP EPA  
LAB RESULTS FROM 8/7/84 INSPECTION.

RECORD NUMBER 166  
10/04/84 CODE: INSP  
LABORATORY RESULTS FROM NEIC CONCERNING AUGUST  
1984 EPA INSPECTION (NOTE: TEN OF ELEVEN SAMPLES  
CONTAINED PCBs).

RECORD NUMBER 167  
10/04/84 CODE: LET EPA C  
NEIC REPORTS OF ANALYSIS FOR SAMPLES RE  
VII-84-T-331.

RECORD NUMBER 168  
10/08/84 CODE: LET ROSE A

RECORD NUMBER 169  
10/09/84 CODE: LET ROSE M  
LETTER FROM DWIGHT THOMAS TO EPA RE PCB REACTOR  
PLATFORM MODIFICATION.

RECORD NUMBER 170  
10/10/84 CODE: LET EPA C  
DAVID WAGONER TO DAVID TRIPP, INFORMING THAT ROSE  
FAILED TO COMPLY WITH TERMS OF CONSENT AGREEMENT,  
REQUEST ACTION BE INITIATED TO COLLECTED REMAINDER  
OF PENALTY. ATTACHED REVIEWS OF PCB CAPACITOR AND  
TRANSFORMER VIOLATIONS.

RECORD NUMBER 171  
10/12/84 CODE: LET EPA A  
LETTER TO MARTHA C. ROSE FROM MORRIS KAY, EPA  
REGION VII REGIONAL ADMINISTRATOR, MODIFYING  
CONDITION 9H OF MARCH 15, 1983, APPROVAL. IF WASTE  
FROM PROCESS HAS pH OF 12.5 OR GREATER IT IS  
CONSIDERED RCRA WASTE.

RECORD NUMBER 172  
10/15/84 CODE: INSP EPA  
CRIMINAL INVESTIGATION OF ROSE EMPLOYEES, DATA  
ENFORCEMENT SENSITIVE.

RECORD NUMBER 173  
10/18/84 CODE: LET EPA C  
LETTER TO ROSE STATING THAT THEY VIOLATED THE  
CONCENT ORDER.

RECORD NUMBER 174  
10/18/84 CODE: LET EPA C  
LETTER FROM MORRIS KAY TO W. CAROLAN RE ROSE'S  
FAILURE TO ADHERE TO COMPLIANCE SCHEDULE, BALANCE  
OF PENALTY DUE AND PAYABLE.

RECORD NUMBER 175  
10/18/84 CODE: CIVIL  
LETTER TO ROSE STATING THAT THE CONSENT ORDER FOR  
VII-84-T-181 WAS VIOLATED. ASKING PAYMENT OF  
\$23,000 REMAINING OF THE \$30,000 PENALTY  
ORIGINALLY ASSESSED.

RECORD NUMBER 176  
10/23/84 CODE: LET ROSE A  
ROSE LETTER TO EPA IN RESPONSE TO LETTER OF  
OCTOBER 18, 1984, CONCERNING ROSE'S FAILURE TO  
MEET CONDITIONS OF JULY 2, 1984, CONSENT AGREEMENT

RECORD NUMBER 177  
10/23/84 CODE: LET ROSE C  
W. CAROLAN TO ROMPAGE RE EPA'S ALLEGATIONS THAT  
ROSE FAILED TO COMPLY WITH CONSENT AGREEMENT,

RECORD NUMBER 178  
10/23/84 CODE: PHONE MCR  
TCR BETWEEN BERTRAM AND THOMAS REGARDING U.S.  
ECOLOGY REQUIRING SPILL REPORTS FROM MCR FOR SPILL  
MATERIAL SENT TO BEATTY, NV.

RECORD NUMBER 179  
10/23/84 CODE: PHONE ROSE  
ROSE/BERTRAM DISCUSSION ON U.S. ECOLOGY REQUIRING  
SPILL REPORTS ON ALL DEBRIS TO THEIR LANDFIELD.

RECORD NUMBER 180  
10/26/84 CODE: LET EPA C  
ROMPAGE TO W. CAROLAN, GRANTED 15-DAY POSTPONEMENT  
IN PAYMENT OF CIVIL PENALTY, AND SET MEETING FOR  
NOVEMBER 1, 1984, RE EPA'S POSITION ON CHARGES.

RECORD NUMBER 181  
11/02/84 CODE: LET ROSE C  
DWIGHT THOMAS TO HENRY ROMPAGE SUMMARIZING 11-1-84  
EPA/ROSE MEETING RE COMPLIANCE WITH FINAL ORDER  
(TSCA DOCKET VII-84-T-181).

RECORD NUMBER 182  
11/02/84 CODE: LET EPA C  
HENRY ROMPAGE TO WALTER CAROLAN, RE 11-1-84  
MEETING ON COMPLIANCE WITH FINAL ORDER. AFFIRMS  
EPA'S POSITION THAT REMAINDER OF PENALTY (\$23,000)  
IS DUE AND PAYABLE BY NOVEMBER 13, 1984.

RECORD NUMBER 183  
11/02/84 CODE: LET ROSE C  
ROSE'S LETTER TO HENRY ROMPAGE REFERENCING MEETING  
OF 11/1/84 CONCERNING VIOLATION OF FIRST CONSENT  
AGREEMENT.

RECORD NUMBER 184  
11/11/84 CODE: APPLICATIN  
REQUEST FOR INTERIM APPROVAL TO PROCESS PCB  
TRANSFORMERS.

RECORD NUMBER 185  
11/12/84 CODE: LET ROSE C  
WALTER CAROLAN'S MOTION FOR APPEAL AND REQUEST FOR  
HEARING BEFORE THE ADMINISTRATIVE LAW JUDGE, RE  
TSCA DOCKET VII-84-T-181.

RECORD NUMBER 186  
11/14/84 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING APPROVAL TO CLEAN  
DRUMS, TOOLS, AND METAL PARTS

RECORD NUMBER 187  
11/30/84 CODE: LET EPA C

RESPONDENT'S MOTION FOR APPEAL AND REQUEST FOR A  
HEARING BEFORE THE ADMINISTRATIVE LAW JUDGE.

RECORD NUMBER 188  
12/05/84 CODE: PHONE OTHR  
BADGER REPORTING IMPROPER STORAGE OF CAPACITOR  
CORES TO DIANE MOLINE, TOPE.

RECORD NUMBER 189  
12/06/84 CODE: LET ROSE H  
ROSE LETTER TO HEADQUARTERS REQUESTING BLEND DOWN.

RECORD NUMBER 190  
12/06/84 CODE: LET ROSE P  
DWIGHT THOMAS TO JOHN MOORE REGARDING AGENCY  
POLICY ON DILUTION OF PCB-CONTAMINATED MINERAL  
OILS.

RECORD NUMBER 191  
12/06/84 CODE: LET ROSE P  
LETTER FROM MCR TO JOHN MOORE, HQ, REQUESTING  
BLEND DOWN OF PCBs WITH REACTOR PRODUCT. ATTACHED  
IS A REQUEST TO REGION VII DATED 1/10/84 AND AN  
8/30/84 RESPONSE FROM EPA.

RECORD NUMBER 192  
12/11/84 CODE: LET EPA C  
ACTUALLY DATED 12/84. HENRY ROMPAGE'S DRAFT  
RESULTS OF INFORMATION REQUESTED FROM ROSE BY EPA.  
RE DEFERRED PAYMENT OF \$23,000 ON TSCA DOCKET  
VII-84-T-181 PROVIDED ROSE MET COMPLIANCE  
SCHEDULE. SUBSEQUENT INSPECTIONS DOCUMENTED  
ROSE'S FAILURE TO COMPLY WITH SCHEDULE. DRAFT  
STATES THAT EPA NOTIFIED ROSE THAT REMAINDER IS  
DUE AND PAYABLE.

RECORD NUMBER 193  
12/11/84 CODE: LET EPA P  
LETTER FROM RUBEN MC CULLERS TO MCR REGARDING USE  
OF BULK CONTAINERS FOR PCB CAPACITOR CORES.  
STATES CONTAINER MUST BE REVIEWED AND DOCUMENTED  
BY DOT AS MEETING REGULATORY REQUIREMENTS.  
ATTACHED IS 11/29/84 REQUEST FROM MCR TO RUBEN  
MC CULLERS FOR USE OF BULK CONTAINERS AND AN  
11/24/84 TCR.

RECORD NUMBER 194  
12/12/84 CODE: LET EPA C  
MORRIS KAY DENIES ROSE'S REQUEST TO REOPEN TSCA  
DOCKET VII-84-T-181 AFTER CASE CLOSURE.

RECORD NUMBER 195  
12/21/84 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING APPROVAL TO BLEND  
DOWN HIGH PARTS PER MILLION (PPM) OIL TO PROCESS.

RECORD NUMBER 196

01/03/85 CODE: LET EPA A  
LETTER FROM EPA TO MARTHA C. ROSE REQUESTING  
ADDITIONAL INFORMATION ON TYPES OF MATERIAL TO BE  
PROCESSED, QA/QC, DISASSEMBLY AND SAMPLING FOR THE  
TRANSFORMER PROCESSING APPLICATION.

RECORD NUMBER 197  
01/03/85 CODE: LET EPA C  
MEMORANDUM FROM HENRY ROMPAGE TO MORRIS KAY  
REGARDING COMPLAINT VII-84-T-181. RESPONDENT  
SUBMITTED REMAINDER OF CIVIL PENALTY OF \$23,000.  
CASE CLOSED.

RECORD NUMBER 198  
01/04/85 CODE: LET ROSE A  
ROSE LETTER TO MORRIS REQUESTING REVIEW STATUS OF  
(1) RECORDKEEPING UPDATE (SEPTEMBER 7, 1984); (2)  
CLEANING OF DRUMS TOOLS, MISC. METAL (NOVEMBER 14,  
1984); (3) DECONTAMINATION OF ELECTRICAL EQUIPMENT  
(NOVEMBER 14, 1984); AND BLENDING OF OIL (DECEMBER  
6, 1984 TO HQ, DECEMBER 21, 1984 TO REGION VII).

RECORD NUMBER 199  
01/07/85 CODE: LET HQ P  
LETTER FROM HEADQUARTERS TO ROSE DENYING APPROVAL  
TO BLEND DOWN HIGH PARTS PER MILLION OIL TO  
PROCESS.

RECORD NUMBER 200  
01/07/85 CODE: APPLICATIN  
RESUBMITTED REQUEST FOR INTERIM APPROVAL TO  
DISPOSE OF PCB TRANSFORMERS.

RECORD NUMBER 201  
01/11/85 CODE: PHONE ROSE  
TELEPHONE CONVERSATION RECORD FROM DWIGHT THOMAS  
(ROSE) TO EPA REQUESTING ABILITY TO BLEND DOWN  
HIGH PARTS PER MILLION (PPM) OIL TO PROCESS.

RECORD NUMBER 202  
01/24/85 CODE: LET OTHER  
UNION UNDERWEAR COMPANY REQUEST FOR COPY OF  
INFORMATION ON MARTHA C. ROSE CHEMICAL COMPANY.

RECORD NUMBER 203  
01/29/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO UNION UNDERWEAR COMPANY,  
BOWLING GREEN, KENTUCKY, ENCLOSING COPY OF  
COMPLAINT AND CONSENT AGREEMENT, VII-84-T-181.

RECORD NUMBER 204  
02/04/85 CODE: LET EPA A  
RESPONCE TO ROSE 1/4/85 LETTER GIVING REVIEW  
STATUS AND COMMENTS ON RECORDKEEPING FORMS

RECORD NUMBER 205

LETTER TO MARTHA C. ROSE FROM EPA STATING  
DEFICIENCIES IN DECEMBER 21, 1984, REQUEST TO  
BLEND PCB OIL WITH PROCESSED OIL.

RECORD NUMBER 206  
02/25/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO IOWA PUBLIC SERVICE  
COMPANY, SIOUX CITY, IOWA, ENCLOSING COPIES OF  
COMPLAINTS VII-84-T-181, ISSUED TO ROSE, AND  
VII-84-T-317, ISSUED TO PCB DISPOSAL SYSTEMS, INC.

RECORD NUMBER 207  
02/25/85 CODE: CIVIL  
TSCA DOCKET VII-84-T-331, ADMINISTRATIVE COMPLAINT  
AND NOTICE OF OPPORTUNITY FOR HEARING.

RECORD NUMBER 208  
03/06/85 CODE: LET ROSE P  
LETTER FROM MCR TO BERTRAM STATING LIGHT BALLASTS  
ARE NOT REGULATED FOR DISPOSAL

RECORD NUMBER 209  
03/11/85 CODE: SETTLEMENT  
DWIGHT THOMAS TO HENRY ROMPAGE, REQUESTING  
INFORMAL SETTLEMENT CONFERENCE, VII-84-T-331.

RECORD NUMBER 210  
03/11/85 CODE: LET WTSI I  
LETTER FROM WASTE TECH SERVICES, INC., TO WALTER  
CAROLAN RE PRINCIPLES OF AGREEMENT OF INCINERATION  
SERVICES TO BE PERFORMED IN HOLDEN.

RECORD NUMBER 211  
03/11/85 CODE: LET OTHER  
REGIONAL HEARING CLERK ENCLOSURES COPY OF COMPLAINT  
VII-84-T-331 ISSUED TO ROSE AND VII-84-T-317  
ISSUED TO PCB DISPOSAL SYSTEMS, TO ENVIRONMENTAL  
RESOURCES MANAGEMENT.

RECORD NUMBER 212  
03/11/85 CODE: LET OTHER  
WASTE TECH SERVICES, INC., LETTER TO ROSE  
PROVIDING DRAFT PRINCIPLES OF AGREEMENT FOR  
INCINERATION SERVICE.

RECORD NUMBER 213  
03/12/85 CODE: LET OTHER  
REQUEST FOR COPY OF COMPLAINT VII-84-T-331 BY PCB  
DISPOSAL SYSTEMS, INC.

RECORD NUMBER 214  
03/12/85 CODE: LET OTHER  
REQUEST BY SOUTHWESTERN ELECTRIC POWER CO.,  
SHREVEPORT, LA, FOR COPY OF COMPLAINT AGAINST  
PCB DISPOSAL SYSTEMS, INC.



RECORD NUMBER 215  
03/14/85 CODE: LET OTHER  
REGIONAL HEARING CLERK ENCLOSES COPY OF COMPLAINT,  
VII-84-T-331, TO PCB DISPOSAL SYSTEMS, INC.

RECORD NUMBER 216  
03/15/85 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSES COPY OF COMPLAINT,  
VII-84-T-331, TO KCLICKITAT, PUD, GOLDENDALE,  
WASHINGTON.

RECORD NUMBER 217  
03/15/85 CODE: ANSWER  
ROSE 14 PAGE ANSWER AND REQUEST FOR HEARING  
VII-84-T-331.

RECORD NUMBER 218  
03/15/85 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSES COPY OF COMPLAINT,  
VII-84-T-331, TO SOUTHWESTERN ELECTRIC POWER CO.,  
SHREVEPORT, LA.

RECORD NUMBER 219  
03/15/85 CODE: LET MDNR  
MDNR LETTER TO ROSE EXTENDING NPDES PERMIT  
APPLICATION UNTIL 4/5/85.

RECORD NUMBER 220  
03/18/85 CODE: ANSWER  
REGIONAL HEARING CLERK TO CHIEF ALJ FINCH,  
ENCLOSING COPIES OF ROSEANSWER AND REQUEST FOR  
HEARING, VII-84-T-331.

RECORD NUMBER 221  
03/18/85 CODE: CIVIL  
ROSE ANSWERED TO CIVIL COMPLAINT DOCKET NO.  
VII-84-T-331 SUBMITTED TO JUDGE FINCH BY REGIONAL  
HEARING CLERK.

RECORD NUMBER 222  
03/26/85 CODE: LET ROSE A  
LETTER TO EPA REGARDING MODIFICATION TO MARCH 10,  
1983, APPROVAL FOR ROSE'S OIL PROCESSING.

RECORD NUMBER 223  
03/26/85 CODE: LET ROSE A  
LETTER FROM PCB ELIMINATORS TO EPA, JOHN FRANKE  
(REGIONAL ADMINISTRATOR) REGARDING APPLICATION FOR  
ALTERNATIVE METHOD FOR PCB DESTRUCTION SUBMITTED  
BY MARTHA C. ROSE CHEMICALS, DBA PCB ELIMINATORS.

RECORD NUMBER 224  
03/27/85 CODE: SETTLEMENT  
ROSEANSWER, SETBACK, NO GUILTY, SMITHSON, THOMAS

(AND OTHERS). SETTLEMENT NEGOTIATION SESSION,  
VII-84-T-181.

RECORD NUMBER 225  
03/29/85 CODE: LET EPA A  
LETTER TO WALT CAROLAN REFUSING MODIFICATION OF  
APPROVAL AS REQUESTED BY ROSE, JANUARY 7, 1985.

RECORD NUMBER 226  
03/30/85 CODE: LET ROSE C  
J. CAROLAN TO SMITHSON, RE TAX RETURNS FOR PERIOD  
8/31/84. RECEIVED EXTENSION OF TIME FOR FILING,  
FINAL SUBMISSION TO BE 5/15/85. ANTICIPATE GROSS  
RECEIPTS TO BE \$2,335,000 (SHAREHOLDERS IDENTIFIED  
AS GERALD JESPERSON, WICHITA, KS; AND WALTER C.  
CAROLAN, MISSION HILLS, KS).

RECORD NUMBER 227  
04/03/85 CODE: LET EPA C  
CHIEF ALJ EDWARD B. FINCH DESIGNATES MARVIN E.  
JONES AS ALJ IN PROCEEDING VII-84-T-331.

RECORD NUMBER 228  
04/08/85 CODE: LET ROSE A  
ROSE LETTER TO EPA REQUESTING WRITTEN RESPONSE TO  
TWO MODIFICATION REQUESTS

RECORD NUMBER 229  
04/08/85 CODE: LET EPA C  
ALJ JONES IDENTIFIES HIMSELF AS HEARING OFFICER,  
SETS MAY 3, 1985, AS PREHEARING EXCHANGE FILING.

RECORD NUMBER 230  
04/08/85 CODE: LET ROSE M  
LETTER FROM DWIGHT THOMAS REQUESTING RESPONSE TO A  
10/9/84 LETTER ON PROCESS MODIFICATIONS.

RECORD NUMBER 231  
04/11/85 CODE: LET EPA D  
SPRATLIN'S LETTER TO IOWA PUBLIC SERVICE COMPANY,  
PROVIDED KNOWN GENERATOR LIST.

RECORD NUMBER 232  
04/12/85 CODE: SETTLEMENT  
SETTLEMENT CONFERENCE (VII-84-T-181). ROMPAGE,  
GEORGE BANG, JIM FLEER, MC CULLERS, SMITHSON,  
CAROLAN, D. THOMAS. ROSE TALKED ABOUT WASTE TECH,  
INCINERATOR FINANCED BY BECHTEL. ROSE WOULD NEED  
TO INVEST \$100K IMMEDIATELY, AND IN JULY START  
SITE IMPROVEMENTS OF \$200K.

RECORD NUMBER 233  
04/12/85 CODE: LET ROSE C  
SMITHSON REQUESTS EXTENSION OF PREHEARING EXCHANGE  
FILING.

RECORD NUMBER 234  
04/17/85 CODE: LET EPA C  
ALJ JONES TO ROSE/CNSL, EXTENDING FILING OF  
PREHEARING EXHCNAGE TO JUNE 7, 1985.

RECORD NUMBER 235  
04/19/85 CODE: LET OTHER  
NEW ENGLAND POWER SERVICE COMPANY REQUESTS COPIES  
OF CIVIL COMPLAINTS FILED AGAINST MARTHA C. ROSE.

RECORD NUMBER 236  
04/22/85 CODE: SETTLEMENT  
SETTLEMENT CONFERENCE. HENRY ROMPAGE, RUBEN MC  
CULLERS, TONY PETRUSKA, W & J CAROLAN, DWIGHT  
THOMAS, SMITHSON. DISCUSSED FINANCIAL STATUS,  
NEGATIVE NET WORTH. DISCUSSED CESSATION OF NEW  
INVENTORY, HOW PENALTY WAS DERIVED (VII-84-T-181).

RECORD NUMBER 237  
04/23/85 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSES COPY OF CIVIL  
ACTIONS VII-84-T-181 AND VII-84-T-331 TO NEW  
ENGLAND POWER SERVICE COMPANY, WESBOROUGH,  
MASSACHUSETTS.

RECORD NUMBER 238  
04/24/85 CODE: LET ROSE C  
SMITHSON ENCLOSED FINANCIAL STATEMENTS FOR ROSE  
FOR YEAR ENDED AUGUST 31, 1984, AND COPY OF  
FEDERAL INCOME TAX RETURNS.

RECORD NUMBER 239  
04/25/85 CODE: LET OTHER -- --  
MARINE POLLUTION CONTROL, DETROIT, MICHIGAN,  
REQUESTS COPIES OF ALL CIVIL ACTIONS FILED AGAINST  
MARTHA C. ROSE.

RECORD NUMBER 240  
04/26/85 CODE: LET EPA C  
REGIONAL HEARING CLERK ENCLOSES COPY OF CIVIL  
ACTIONS VII-84-T-181 AND VII-84-T-331 TO MARINE  
POLLUTION CONTROL, DETROIT, MICHIGAN.

RECORD NUMBER 241  
04/30/85 CODE: SETTLEMENT  
ACTUAL DATE ON DOCUMENT IS 4/85. DISCUSSION NOTES  
FOR ROSE MITIGATION.

RECORD NUMBER 242  
04/30/85 CODE: SETTLEMENT  
ACTUAL DATE ON DOCUMENT IS 4/85. MARTHA C. ROSE  
FINANCIAL STATEMENTS FOR AUGUST 31, 1982 AND 1983.

RECORD NUMBER 243  
05/06/85 CODE: MEMO EPA

7, 1985 MEMO TRANSMITTING TWO PCB SPILL INCIDENTS  
ON LEAKING CONTAINERS FROM MCR TO ENVIROSAFE

RECORD NUMBER 244  
05/06/85 CODE: MEMO EPA

RECORD NUMBER 245  
05/09/85 CODE: PHONE MAYR  
MAYOR VOICING CONCERN ON INCINERATORY FACILITY AT  
HOLDEN. SAID HE HAD SEVERAL EMPLOYEES OF ROSE WHO  
WOULD BE WILLING TO TALK TO EPA INVESTIGATORS.

RECORD NUMBER 246  
05/10/85 CODE: TCR EPA H  
SUMMARY OF PHONE CONVERSATION WITH MAYOR  
BRILLHART, HOLDEN, REGARDING PROBLEMS WITH ROSE.

RECORD NUMBER 247  
05/16/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE NO. 2. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 248  
05/16/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE NO. 1. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 249  
05/21/85 CODE: LET ROSE C  
SMITHSON PROVIDES SUMMARY OF ROSE PURCHASES FOR  
FISCAL PERIOD AUGUST 31, 1984; INCLUDES  
DETOXIFICATION EXPENSES OF TECHNICAL AND  
Nontechnical SERVICES, COMMUNICATION,  
SUBCONTRACTS, TRANSPORTATION, MATERIALS, SPACE.  
TOTAL \$2,020,003.

RECORD NUMBER 250  
05/23/85 CODE: LET ROSE T  
LETTER FROM ROSE ENCLOSING A COPY OF EPA-HQ PCB  
TRANSFORMER RECLASSIFICATION APPROVAL REGULATION.

RECORD NUMBER 251  
05/30/85 CODE: MTG EPA I  
RECORD OF COMMUNICATION ON MEETING BETWEEN EPA AND  
ELIOT COOPER (WASTE TECH SERVICE INDUSTRIES).

RECORD NUMBER 252  
05/30/85 CODE: INSP EPA  
INTERVIEW WITH ROSE EMPLOYEE. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 253  
05/30/85 CODE: INSP EPA  
CRIMINAL INVESTIGATION NO. 3. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 254  
05/30/85 CODE: INSP EPA  
CRIMINAL ENVESTIGATION. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 255  
05/30/85 CODE: INSP EPA  
CRIMINAL INVESTIGATION. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 256  
05/30/85 CODE: INSP EPA  
CRIMINAL INVESTIGATION NO. 2. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 257  
06/03/85 CODE: LET ROSE C  
SMITHSON TO HENRY ROMPAGE, EPA, CONFIRMING  
AGREEMENT TO CONTINUE PRE-EXISTING ORDERS TO JULY  
10, 1985.

RECORD NUMBER 258  
06/04/85 CODE: LET EPA C  
HENRY ROMPAGE TO ALJ JONES REQUESTING EXTENSION  
FOR FILING PREHEARING EXCHANGE, SINCE COMPLICATED  
MATTERS ARE INVOLVED AND DISCUSSIONS ARE TIME  
CONSUMING.

RECORD NUMBER 259  
06/06/85 CODE: LET EPA C  
ALJ JONES TO ROSE/CNSL, EXTENDING TO JULY 11,  
1985, THE FILING OF PREHEARING EXCHANGE.

RECORD NUMBER 260  
06/07/85 CODE: CHT WTS R  
ACTIVITY DESCRIPTION FOR JUNE 1985 THROUGH JUNE  
1986 FOR WASTE TECH SERVICES, INC., BY BECHTEL  
NATIONAL, INC., SAN FRANCISCO, CA.

RECORD NUMBER 261  
06/10/85 CODE: LET ROSE T  
LETTER FROM ROSE TO HQ WITH ENCLOSURE OF PCB  
TRANSFORMER INFORMATION. IT'S A CONTINUATION OF  
EPA APPROVAL PCB TRANSFORMER RECLASSIFICATION).

RECORD NUMBER 262  
06/10/85 CODE: LET ROSE A  
LETTER FROM MCR TO KEEHNER PROVIDING A LIST OF  
TRANSFORMERS FOR DISPOSAL UNDER SIMULATED IN  
SERVICE CONDITIONS (MARCH 6, 1984 APPROVAL)

RECORD NUMBER 263  
06/10/85 CODE: INSP EPA  
CRIMINAL INVESTIGATION. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 264  
06/10/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 265  
06/13/85 CODE: INSP EPA  
CRIMINAL INVESTIGATION. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 266  
06/13/85 CODE: INSP EPA  
CRIMINAL INVESTIGATION. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 267  
06/13/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE NO. 1. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 268  
06/13/85 CODE: INSP EPA  
INTERVIEW WITH EX ROSE EMPLOYEE NO. 2. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 269  
06/13/85 CODE: INSP OSHA  
OSHA REFERRAL REPORT AND NOTIFICATION OF PENALTY  
RESULTING FROM 5/31 - 6/7/85 OSHA INSPECTION.  
\$1,000 PENALTY.

RECORD NUMBER 270  
06/19/85 CODE: SETTLEMENT  
SETTLEMENT CONFERENCE, VII-84-T-181. DISCUSSED  
SETTLEMENT WITH CONDITIONS.

RECORD NUMBER 271  
06/20/85 CODE: MTG EPA I  
MEETING BETWEEN EPA AND WASTE TECH ON INCINERATION  
PROGRAM - GENERAL.

RECORD NUMBER 272  
06/24/85 CODE: SETTLEMENT  
SETTLEMENT CONFERENCE ON TSCA DOCKET VII-84-T-181.  
ATTENDEES OF CONFERENCE WERE HENRY ROMPAGE,  
WOLFGANG BRANDER, ANTHONY PETRUSKA, RUBEN MC  
CULLERS (ALL OF EPA); AND DWIGHT THOMAS, SMITHSON,  
REPRESENTING MARTHA C. ROSE CHEMICAL CO.

RECORD NUMBER 273  
06/24/85 CODE: INSP OSHA  
DRAFT OSHA CITATION

RECORD NUMBER 274  
06/27/85 CODE: LET ROSE C  
SMITHSON TO ADMINISTRATIVE LAW JUDGE JONES THAT  
AGREEMENT REACHED IN SETTLEMENT OF TSCA DOCKET NO.  
VII-84-T-331.

RECORD NUMBER 275  
06/28/85 CODE: LET EPA T  
LETTER FROM EPA HEADQUARTERS TO DWIGHT THOMAS IN  
RESPONSE TO 5/20/85 LETTER.

RECORD NUMBER 276  
06/28/85 CODE: LET HQ P  
LETTER FROM HQ TO MCR REFERRED A REQUEST TO  
DISMANTLE LARGE TRANSFORMERS PRIOR TO TRANSPORT TO  
REGION VII.

RECORD NUMBER 277  
07/01/85 CODE: LET EPA A  
KAY LETTER INDICATING NEED TO COVER CLOSURE COST  
AND LIABILITY INSURANCE

RECORD NUMBER 278  
07/01/85 CODE: MEETING  
HENRY ROMPAGE, GEORGE BANK, RUBEN MC CULLERS, TONY  
PETRUSKA - EPA; AND SMITHSON, DWIGHT THOMAS, AND  
CAROLAN - ROSE -- BANG PARTICIPATED SINCE HE WILL  
BE REVIEWING PERMIT REVISIONS. PERMITS WILL BE  
REVISED TO RUN FOR THREE YEARS.

CONDITION OF CONSENT AGREEMENT AND FINAL ORDER TO  
SUBMIT ALL INFORMATION BY DATE CERTAIN. DISCUSSED  
PERMIT REQUIREMENTS.

RECORD NUMBER 279  
07/01/85 CODE: LET EPA A  
REQUIRING SUBMITTAL OF DOCUMENTATION OF FINANCIAL  
ASSURANCE, CLOSURE/POST CLOSURE COSTS AND  
LIABILITY COVERAGE FOR PCB DISPOSAL OPERATION.

RECORD NUMBER 280  
07/01/85 CODE: MEET EPA A  
RECORD OF COMMUNICATION ON MEETING WITH ROSE IN  
SETTLING ROSE'S COMPLIANCE PROBLEMS. MEETING WAS  
ATTENDED BY WALTER CAROLAN, DWIGHT THOMAS, AN  
ATTORNEY FOR ROSE, RUBEN MC CULLERS, TONY  
PETRUSKA, HENRY ROMPAGE, AND GEORGE BANG.

RECORD NUMBER 281  
07/02/85 CODE: PHONE MAYR  
MAYOR BRILLHART CALLED TO REPORT ROSE ACCIDENT AND  
VIOLATIONS.

RECORD NUMBER 282  
07/05/85 CODE: LET EPA T

LETTERS BETWEEN HQ AND ROSE. FORWARDED TO TOPE  
FOR POSSIBLE FUTURE COMPLIANCE MEASURE.

RECORD NUMBER 283  
07/09/85 CODE: TCR EPA A  
RECORD OF COMMUNICATION RE MEETING WITH DWIGHT  
THOMAS TO DISCUSS ROSE'S REAPPLICATION (NEWLY  
REVISED).

RECORD NUMBER 284  
07/10/85 CODE: MEMO EPA  
MEMO FORM REGION 10 TO SANDERSON TRANSMITTING A  
REPORT OF TWO SPILLS. ONE INVOLVING A TRUCK LEASED  
TO MCR GOING TO ENVIROSAFE

RECORD NUMBER 285  
07/11/85 CODE: LET OTHER  
REQUEST FROM SCHIEFF, HARDIN AND WAITE, FOR COPIES  
OF ALL DOCUMENTS FILED IN TSCA DOCKET  
VII-84-T-331.

RECORD NUMBER 286  
07/15/85 CODE: LET EPA C  
REQUEST FOR CONCURRENCE IN REDUCING PENALTY  
GREATER THAN 40 PERCENT, VII-84-T-331.

RECORD NUMBER 287  
07/15/85 CODE: LET EPA A  
LETTER FROM EPA TO DWIGHT THOMAS, ROSE, ENCLOSING  
DESIGN SPEC SHEETS FOR TANK AND SOLVENT GREASERS.  
SPECS WERE REQUIRED AS PART OF NEW PCB DISPOSAL  
APPLICATION PACKAGE IN REGION VII.

RECORD NUMBER 288  
07/17/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO SCHIFF, HARDIN AND  
WAITE, CHICAGO, IL., ENCLOSING COPIES OF ALL  
DOCUMENTS FILED REGARDING VII-84-T-331.

RECORD NUMBER 289  
07/17/85 CODE: MEMO EPA T  
MEMORANDUM OF CALL TO EPA FROM KAREN NORTH OF  
WASTE TECH SERVICES, INC.

RECORD NUMBER 290  
07/19/85 CODE: CNP OSHA R  
CITATION AND NOTIFICATION OF PENALTY BY OSHA FOR  
§810, SIGNED BY JOHN O. SCHILTZ.

RECORD NUMBER 291  
07/22/85 CODE: LET EPA C  
SIGNED CONCURRENCE TO REDUCE PENALTY GREATER THAN  
40 PERCENT, VII-84-T-331.



CONTROLLED CONGRESSIONAL FROM IKE SKELTON  
REQUESTING INFORMATION ON INCINERATION OF PCBS ON  
BEHALF OF MAYOR BRILLHART, HOLDEN, MISSOURI.

RECORD NUMBER 293  
07/23/85 CODE: TCR EPA P  
RECORD OF COMMUNICATION PREPARED BY MIKE WOLFRAM,  
RCRA, CONCERNING "BACKGROUND OF PCB  
IMPLEMENTATION." REQUESTED LIST OF LABS THAT  
7/1/85 LETTER REQUIRING FINANCIAL ASSURANCE.

RECORD NUMBER 294  
07/23/85 CODE: LET EPA R  
LETTER TO KAREN NORTH, WASTE TECH SERVICES, INC.,  
REGARDING ACCEPTABLE LEVELS OF PCBS IN INCINERATOR  
RESIDUES.

RECORD NUMBER 295  
07/25/85 CODE: LET EPA L  
LETTER TO DWIGHT THOMAS, ROSE, ENCLOSING A LISTING  
OF EPA CONTRACT LABS. REQUESTED THROUGH TELEPHONE  
CONVERSATION ON 7/23/85.

RECORD NUMBER 296  
07/25/85 CODE: PHONE MAYR  
MAYOR BRILLHART REPORTING VIOLATIONS AT ROSE BY  
EMPLOYEES DILUTING PCBS, CHANGING LABELS.

RECORD NUMBER 297  
07/26/85 CODE: LET EPA C  
E-MAILED DRAFT LETTER TO IKE SKELTON, CONGRESSMAN  
FROM MISSOURI, WHO REQUESTED INFORMATION IN  
INCINERATION OF PCBS.

RECORD NUMBER 298  
07/30/85 CODE: INSP OSHA  
OSHA CITATION AND NOTIFICATION OF PEMAITY FOR  
INSPECTIONS DATED 1-24-85 AND 6-21-85

RECORD NUMBER 299  
08/01/85 CODE: LET CONG  
EPA LETTER TO REP. IKE SKELTON ON THE INCINERATION  
OF PCBS IN RESPONSE TO MAYOR BRILLHART'S REQUEST

RECORD NUMBER 300  
08/02/85 CODE: LET ROSE C  
SMITHSON TO ALJ JONES, REGARDING STATUS OF  
SETTLING VII-84-T-331, "REASONABLE PROGRESS IS  
BEING MADE."

RECORD NUMBER 301  
08/06/85 CODE: PHONE MAYR  
MAYOR VOICING CONCERN THAT TOPS OF TRANSFORMERS  
BEING REMOVED WITH CUTTING TORCH AND PCB BEING

RECORD NUMBER 302  
08/09/85 CODE: LET ROSE F  
LETTER FROM ROSE'S ATTORNEY RE MORRIS KAY'S LETTER  
OF 7/1/85 PERTAINING TO FINANCIAL ASSURANCE  
DOCUMENTATION.

RECORD NUMBER 303  
08/23/85 CODE: LET EPA I  
LETTER TO MS. ROSANNE FERGUSON, HOLDEN, FOLLOWING  
UP ON A TELEPHONE CONVERSATION OF 8/22/86. WANTED  
GENERAL INFORMATION ON PCBs.

RECORD NUMBER 304  
08/23/85 CODE: MEMO MDNR  
DEPARTMENT OF ENVIRONMENTAL QUALITY MEMO TO  
BRUNNER  
(MDNR) ON COMPLAINTS TO LT. GOV. HARRIET WOODS,  
MISSOURI, FROM MAYOR BRILLHART CONCERNING ROSE.

RECORD NUMBER 305  
08/26/85 CODE: LET EPA D  
LETTER FROM EPA TO WOLFGANG SCHMIDT (SPENCER,  
FANE, BRITT, AND BROWNE) RE FINANCIAL REQUIREMENTS  
FOR PCB DISPOSAL FACILITIES.

RECORD NUMBER 306  
08/27/85 CODE: LET WTSI P  
LETTER FROM WASTE TECH SERVICES, INC., TO LYNN  
HARRINGTON, RCRA, STATING THAT THEY WILL NOT NEED  
A PERMIT TO INCINERATE TRICHLOROBENZENE.

RECORD NUMBER 307  
08/27/85 CODE: LET EPA T  
LETTER FROM EPA TO DWIGHT THOMAS, MCR - HOLDEN,  
REGARDING TEST RESULTS OF TRANSFORMER PROCESS  
DEMONSTRATION OF APRIL 17, 1985.

RECORD NUMBER 308  
09/10/85 CODE: LET EPA C  
ROMPAGE TO SMITHSON, ENCLOSING CONSENT AGREEMENT  
AND FINAL ORDER, VII-84-T-331, AND AFFIRMING  
PENALTY OF \$46,000, WITH \$10,000 TO BE PAID  
IMMEDIATELY AND BALANCE DEFERRED.

RECORD NUMBER 309  
09/17/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO ROSE ATTORNEY, SENDING  
TWO COPIES, ORIGINAL SIGNATURES, OF CONSENT  
AGREEMENT AND FINAL ORDER, RE TSCA DOCKET NO.  
VII-84-T-331.

RECORD NUMBER 310  
09/18/85 CODE: LET ROSE C

CONSENT AGREEMENT, VII-84-T-331, WITH CHANGES  
PURPORTEDLY AGREED WITH CNSL.

RECORD NUMBER 311  
09/19/85 CODE: MTG EPA R  
NOTES ON MEETING WITH ELIOT COOPER ON ROSE/WASTE  
TECH SERVICES, INC.

RECORD NUMBER 312  
09/20/85 CODE: INSP MDNR  
INTERVIEW OF ROSE EMPLOYEES CONCERNING ACTIVITIES  
AT ROSE. DATA ENFORCEMENT SENSITIVE.

RECORD NUMBER 313  
09/24/85 CODE: MEETING  
LEO ALDERMAN PARTICIPATED IN MEETING WITH  
COMMUNITY. REQUESTED BY STATES TO ATTEND.  
SUBJECT: MARTHA C. ROSE CHEMICAL CO.

RECORD NUMBER 314  
09/25/85 CODE: INSP MDNR  
RESULTS OF ANALYSIS OF MISSOURI DEPARTMENT OF  
NATURAL RESOURCES SAMPLES TAKEN SEPTEMBER 18,  
1985, FROM SEDIMENT IN STREAM ON ROSE PROPERTY  
LINE. ENFORCEMENT SENSITIVE.

RECORD NUMBER 315  
09/26/85 CODE: LET ROSE C  
GOLDSTEIN TO ROMPAGE, ENCLOSING ORIGINAL AND THREE  
COPIES OF SIGNED CONSENT AGREEMENT, VII-84-T-331.

RECORD NUMBER 316  
09/27/85 CODE: LET EPA C  
CONSENT AGREEMENT AND FINAL ORDER, TSCA DOCKET  
VII-84-T-331, DATED SEPTEMBER 27, 1986 (LATER  
IDENTIFIED AS HAVING BEEN SEPTEMBER 27, 1986).

RECORD NUMBER 317  
09/27/85 CODE: CONSENT  
THE CONSENT AGREEMENT ENTERED INTO BY ROSE TO  
SETTLE VII-84-T-331. ROSE WAS TO (1) FILE  
STATEMENT THAT NONE OF THE VIOLATIONS ALLEGED IN  
THE COMPLAINT EXIST; (2) MODIFY AND SUBMIT THREE  
NEW APPLICATIONS FOR APPROVALS FOR THE EXISTING  
PERMIT WITHIN 120 DAYS; AND (3) ADJUST  
INVENTORY SYSTEM WITHIN 180 DAYS, PAY \$46,000 OF  
THE REMAINING \$94,200. ROSE DEMONSTRATED  
INABILITY TO PAY ENTIRE \$176,250 PENALTY.

RECORD NUMBER 318  
09/29/85 CODE: INSP MDNR  
MISSOURI DEPARTMENT OF NATURAL RESOURCES  
INSPECTION REPORT ON THEIR INSPECTION OF ROSE.

RECORD NUMBER 319  
09/30/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO CHRIS RICE, PPM,  
ENCLOSING COPY OF CONSENT AGREEMENT RE  
VII-84-T-331.

RECORD NUMBER 320  
09/30/85 CODE: LET MNDNR  
MNDNR'S LETTER TO MAYOR BRILLHART DISCUSSING MNDNR'S  
INSPECTION OF HOLDEN, MISSOURI, AND PROVIDING  
COPIES OF MNDNR'S SAMPLE ANALYSIS RESULTS COLLECTED  
9/18/85.

RECORD NUMBER 321  
10/01/85 CODE: LET MNDNR  
MNDNR LETTER TO ROSE DISCUSSING RESULTS OF THE  
9/18/85 MNDNR INSPECTION AND ADVISING ROSE OF  
MNDNR'S WATER QUALITY STANDARDS.

RECORD NUMBER 322  
10/02/85 CODE: LET EPA C  
REGIONAL HEARING CLERK TO ROSE ATTORNEY, RECEIVED  
UNSIGNED CERTIFIED MAIL RETURN RECEIPTS FOR TWO  
COPIES OF CONSENT AGREEMENT AND FINAL ORDERS RE  
TSCA DOCKET NO. VII-84-T-331; SENDING TWO MORE  
COPIES.

RECORD NUMBER 323  
10/02/85 CODE: LET ROSE C  
REGARDING EFFECTIVE DATE OF CONSENT AGREEMENT AND  
ORDER (TSCA DOCKET VII-84-T-331) AS SEPTEMBER 27,  
1985, NOT SEPTEMBER 25, 1985, NOTED WITH R.A.  
SIGNATURE.

RECORD NUMBER 324  
10/10/85 CODE: INSP EPA  
SAMPLE ANALYSIS RESULTS OF THE SAMPLES COLLECTED AT  
RIG INDUSTRIES ON 9/23/85. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 325  
10/11/85 CODE: LET ROSE C  
CERTIFICATION SIGNED OCTOBER 11, 1985, BY WALTER  
CAROLAN OF COMPLIANCE WITH PARAGRAPH 1 OF CONSENT  
AGREEMENT THAT TO THE BEST OF HIS KNOWLEDGE NO  
VIOLATIONS ALLEGED IN COMPLAINT PRESENTLY EXIST;  
SENT BY COVER LETTER OCTOBER 11, 1985.

RECORD NUMBER 326  
10/16/85 CODE: LET TER  
PAT SULLINS LETTER TO MDC COMPLAINING OF ROSE AND  
REQUIRING HELP.

RECORD NUMBER 327  
10/22/85 CODE: INSP MNDNR  
INSPECTION REPORT FROM 10/2/85 INSPECTION BY MNDNR.

RECORD NUMBER 328  
10/23/85 CODE: LET ROSE C  
LETTER FROM MDNR TO ROSE REGARDING A SEPTEMBER 30,  
1985, LETTER FROM ROSE TO HEALTH UNIT MAKING  
COMMENTS ON 9/24/85 PCB MEETING IN HOLDEN.

RECORD NUMBER 329  
11/08/85 CODE: LET EPA P  
LETTER FROM SPRATLIN TO MCR CONFIRMING PCB  
DISPOSAL OPERATORS MEETING ON 11/19/85.

RECORD NUMBER 330  
11/18/85 CODE: CONFERENCE  
MAYOR BRILLHARDT REQUESTED LEO ALDERMAN AND JUDY  
STURGESS MEET WITH BRILLHARDT. WE SUGGESTED HE  
WRITE DOWN CONCERNS AND QUESTIONS AND GIVE US A  
CALL TO SET UP MEETING DATE. BRILLHARDT DID NOT  
SUBSEQUENTLY REQUEST ANY MEETING.

RECORD NUMBER 331  
11/22/85 CODE: INSP MDNR  
RESULTS OF ANALYSIS FROM SAMPLES IN PIN OAK CREEK,  
SLUDGE AND AREA AROUND ROSE. ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 332  
11/22/85 CODE: INSP MDNR  
ANALYTICAL RESULTS FROM SAMPLES COLLECTED BY LARRY  
ANDERSON, LSP.

RECORD NUMBER 333  
11/26/85 CODE: LET GENRL  
ELECTRIC COMPANY OF OMAHA, NEBRASKA, LETTER TO  
ROSE CHECKING ON STATUS OF PCBs SHIPPED TO ROSE.

RECORD NUMBER 334  
12/12/85 CODE: LET ROSE C  
CHECK DECEMBER 12, 1985, FOR \$10,000 IN PARTIAL  
SETTLEMENT OF TSCA DOCKET NO. VII-84-T-331; SENT  
BY COVER LETTER.

RECORD NUMBER 335  
12/17/85 CODE: INSP EPA  
COLLECTED COPY OF SCALE TICKET ON THE LOAD OF  
SCRAP METAL RECEIVED 9/23/85 FROM ASNER IRON &  
METAL.

RECORD NUMBER 336  
12/18/85 CODE: INSP EPA  
INSPECTION OF ASNER IRON & METAL, KANSAS CITY,  
KANSAS. INSPECTION REVEALED THAT A LOAD OF SCRAP  
METAL BROKERED TO RIG INDUSTRIES ON 9/23/85 WAS  
FROM ROSE.

RECORD NUMBER 337

AN INSPECTION OF ROSE'S FACILITY IN HOLDEN,  
MISSOURI, NOTED VIOLATIONS. ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 338  
12/27/85 CODE: INSP EPA  
INSPECTION OF ASNER IRON & METAL, KANSAS CITY,  
KANSAS. INSPECTION REVEALS METAL FROM ROSE.  
SAMPLES WERE TAKEN OF THE COPPER WIRE FROM PCB  
TRANSFORMER CORES.

RECORD NUMBER 339  
12/27/85 CODE: LET ROSE O  
LETTER FROM CLAY-UNION ELECTRIC CORP. TO MCR  
REQUEST CERTIFICATE OF DISPOSAL FOR MANIFEST NO.  
1091.

RECORD NUMBER 340  
12/27/85 CODE: INSP MDNR  
RESULTS OF ANALYSIS FROM SAMPLES COLLECTED ON  
9/25/85 IN HOLDEN, MISSOURI, PRIMARILY SLUDGE  
SAMPLES. DATA ENFORCEMENT SENSITIVE.

RECORD NUMBER 341  
01/07/86 CODE: INSP EPA  
INSPECTION OF ROSE FACILITY IN HOLDEN, MISSOURI,  
DATA COLLECTED ENFORCEMENT SENSITIVE.

RECORD NUMBER 342  
01/08/86 CODE: PHONE ROSE  
HENRY ROMPAGE, LEO ALDERMAN AND WALT CAROLAN --  
EPA INFORMED ROSE OF JANUARY 7, 1986, INSPECTION,  
SAMPLES COLLECTED WHICH ROSE CLAIMED CBI,  
LEGITIMACY OF CLAIM.

RECORD NUMBER 343  
01/08/86 CODE: PHONE ROSE  
ROMPAGE, J. CAROLAN, DWIGHT THOMAS -- REITERATED  
JANUARY 8, 1986, CONCERNS OF CBI CLAIM ON SAMPLES  
COLLECTED JANUARY 7, 1986. THEY AGREED TO  
WITHDRAW CLAIM.

RECORD NUMBER 344  
01/08/86 CODE: LET ROSE C  
ROSE WITHDRAWAL OF CBI REQUEST ON SAMPLES  
COLLECTED JANUARY 7, 1986.

RECORD NUMBER 345  
01/08/86 CODE: LET EPA C  
RE CBI CLAIM MADE BY PLANT MANAGER FOR SAMPLES  
COLLECTED JANUARY 7, 1986; AGREEMENT TO WITHDRAW  
CLAIM AND CONFIRM IN WRITING.

RECORD NUMBER 346  
01/08/86 CODE: LET ROSE C

1/7/86 AT ROSE.

RECORD NUMBER 347  
01/09/86 CODE: LET EPA D  
LETTER FROM MORRIS KAY TO DAVID A. ANONIS STATING  
NO WASTE TECH INCINERATOR APPROVAL ON FILE.

RECORD NUMBER 348  
01/13/86 CODE: LET ROSE C  
ROSE TO DAVID RAMSEY STATING EFFORTS ARE BEING  
MADE TO COMPLY WITH SUMMARY OF OBSERVATIONS LEFT  
REGARDING INSPECTIONS JANUARY 7, 1986 AND DECEMBER  
19, 1985.

RECORD NUMBER 349  
01/13/86 CODE: INSP EPA  
RECEIVED LAB RESULTS ON SAMPLES COLLECTED DURING  
JANUARY 7, 1986, ENFORCEMENT SENSITIVE.

RECORD NUMBER 350  
01/13/86 CODE: LET ROSE C  
ROSE LETTER STATING INTENT TO CORRECT VIOLATIONS  
OBSERVED ON DECEMBER 19, 1985 AND JANUARY 7, 1986,  
INSPECTIONS.

RECORD NUMBER 351  
01/14/86 CODE: PHONE MAYR  
PHONE CONVERSATION NOTES FROM SPRATLIN TO MAYOR  
BRILLHART OF HOLDEN, REGARDING \$14 MILLION LAW  
SUIT AGAINST CITY, PAYMENT OF ROSE COMPLAINTS AND  
CONSENT AGREEMENT.

RECORD NUMBER 352  
01/17/86 CODE: INSP EPA  
EPA REPORT OF RESPONSE TO SPILL REPORT AT ROSE.  
RECEIVED 1348 HOURS ON 1/6/86.

RECORD NUMBER 353  
01/21/86 CODE: LET EPA D  
LETTER FROM MORRIS KAY TO MS. LORRAINE K. BURNS  
STATING ANY INCINERATOR IN HOLDEN WOULD BE  
ENCOURAGED TO COMPLY WITH LOCAL ORDINANCES.

RECORD NUMBER 354  
01/23/86 CODE: LET EPA A  
LETTER FROM LYNN HARRINGTON, RCRA, TO JUDITH  
STURGESS, TOPE, REGARDING FINANCIAL ASSURANCE AND  
LIABILITY DOCUMENTATION FOR HOLDEN FACILITY.

RECORD NUMBER 355  
01/23/86 CODE: LET ROSE A  
GOLDSTEIN TO HENRY ROMPAGE REGARDING LEO  
ALDERMAN'S JANUARY 21, 1986, LETTER RE ROSE  
SUBMITTAL OF NON CBI APPLICATIONS FOR APPROVALS TO  
COMPLY WITH PREVIOUS CONSENT AGREEMENTS.

RECORD NUMBER 356  
01/23/86 CODE: MEMO EPA F  
MEMO FROM RCRA TO TOPE REGARDING REVIEW OF  
FINANCIAL ASSURANCE AND LIABILITY DOCUMENTATION.

RECORD NUMBER 357  
01/31/86 CODE: LET MDNR  
MISSOURI DEPARTMENT OF NATURAL RESOURCES LETTER  
AUTHORIZING RESOURCE RECOVERY BASICALLY OF PCBS  
LESS THAN 50 PARTS PER MILLION.

RECORD NUMBER 358  
01/31/86 CODE: LET MDNR  
INFORMING ROSE THAT THEY HAD RECEIVED RESOURCE  
RECOVERY CERTIFICATION RR-151-CLASSIFICATION-R-1.

RECORD NUMBER 359  
02/07/86 CODE: MEMO EPA  
JUDITH STURGESS REQUESTS C. E. POINDEXTER TO  
CONDUCT ROSE INSPECTION BASED ON POSSIBLE  
DISCHARGE OF PCBS INTO SEWAGE SYSTEM.

RECORD NUMBER 360  
02/11/86 CODE: LET EPA A  
EPA'S ACKNOWLEDGING RECEIPT OF 4 COPIES OF  
NON-CONFIDENTIAL BUSINESS INFORMATION AND 1 CIB  
COPY FOR CHEMICAL DETOXIFICATION OF PCB  
CONTAMINATED HYDROCARBON FLUIDS.

PCB DECONTAMINATION OF TRANSFORMERS AND OTHER  
RELATED ELECTRICAL EQUIPMENT

DETOXIFICATION AND RESOURCE RECOVERY OF PCB  
CAPACITORS.

RECORD NUMBER 361  
02/11/86 CODE:- LET EPA A  
LETTER FROM LEO ALDERMAN TO MARTHA C. ROSE STATING  
1/27/86 APPLICATIONS WERE RECEIVED.

RECORD NUMBER 362  
02/12/86 CODE: INSP EPA  
SAMPLE ANALYSIS RESULTS FROM 12/27/85 INSPECTION  
OF ASNER IRON & METAL. SAMPLE RESULTS ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 363  
02/13/86 CODE: LET EPA A  
NOTICE OF INTENT TO REVOKE CAPACITOR PROCESSING  
APPROVAL; COMPLIANCE REQUIRED BY MARCH 15, 1986.

RECORD NUMBER 364  
02/13/86 CODE: LET EPA A  
NOTIFICATION OF STATUS OF OIL DETOXIFICATION



RECORD NUMBER 365  
02/13/86 CODE: LET EPA A  
NOTICE OF INTENT TO REVOKE TRANSFORMER PROCESSING  
APPROVAL; COMPLIANCE REQUIRED BY MARCH 15, 1986.

RECORD NUMBER 366  
02/14/86 CODE: PHONE MAYR  
RUBEN MC CULLERS RECEIVED REPORT OF 400 GALLON OIL  
SPILL FROM MAYOR BRILLHART. REFERRED TO JOE  
JOSLIN, ENSV, FOR RESPONSE.

RECORD NUMBER 367  
02/14/86 CODE: SPILL REP  
MAYOR BRILLAHRT REPORTED PCB SPILL INSIDE ROSE  
FACILITY IN HOLDEN, MISSOURI.

RECORD NUMBER 368  
02/18/86 CODE: PHONE MAYR  
BRILLHART WAS CHECKING ON STATUS OF SPILL REPORT  
MADE ON 2/14/86 TO RUBEN MC CULLERS. INFORMED  
SPILL REFERRED TO ENSV FOR RESPONSE.

RECORD NUMBER 369  
02/20/86 CODE: MEETING R  
EPA AND 4 ROSE OFFICIALS. REGARDING INTENT TO  
REVOKE. DISCUSSED VIOLATIONS WHICH ARE BASIS OF  
ACTION. NEED FOR COMPLIANCE BY MARCH 15, 1986.

RECORD NUMBER 370  
02/20/86 CODE: MET ROSE R  
MINUTES OF 2/20/86 MEETING BETWEEN EPA AND MARTHA  
C. ROSE. THOSE ATTENDING WERE: RUBEN MC CULLERS,  
HENRY ROMPAGE, SCOTT GOLDSTEIN, WALTER CAROLAN,  
JIM CAROLAN, AND DWIGHT THOMAS.

RECORD NUMBER 371  
02/20/86 CODE: MEMO EPA  
CHRONOLOGY OF ENSV CONVERSATIONS OVER ROSE SPILL  
FROM 2/18/86 - 2/19/86.

RECORD NUMBER 372  
02/25/86 CODE: PHONE ROSE  
HENRY ROMPAGE AND GOLDSTEN, MARTHA C. ROSE  
CHEMICAL CO.'S ATTORNEY, INQUIRING ABOUT RUMOR OF  
ROSE SHUTTING DOWN OPERATIONS.

RECORD NUMBER 373  
02/25/86 CODE: CIVIL  
EPA REGION VII ISSUED A CIVIL PENALTY OF \$176,250  
FOR NINE COUNTS OF VIOLATIONS TO PCB RULE. THEY  
WERE IMPROPER STORAGE, MARKING, RECORDKEEPING, AND  
DISPOSAL (INCLUDING VIOLATIONS OF CAPACITOR,  
TRANSFORMER AND OIL TREATMENT APPROVALS).

02/26/86 CODE: INSP EPA  
INSPECTION OF ROSE TO DETERMINE STATUS OF  
COMPLIANCE. WERE TOLD PLANT WAS LAYING OFF  
EMPLOYEES AND WERE CEASING OPERATION.  
APPROXIMATELY 1500 DRUMS, 600 64 CU. FT. WOODEN  
CRATES, 26,250 50 LB. PAPER BAGS OF CAPACITOR  
CORES, 400 TRANSFORMERS, AND MISCELLANEOUS PCB  
HANDLING EQUIPMENT.

RECORD NUMBER 375  
02/26/86 CODE: MEMO EPA R  
MEMO TO FILE REGARDING INSPECTION OF 2/26/86 BY  
DAVID RAMSEY AT ROSE. WAS NOTIFIED THAT MCR WOULD  
BE CLOSED AS OF FRIDAY.

RECORD NUMBER 376  
02/26/86 CODE: INSP EPA  
INSPECTION REPORT. DATA ENFORCEMENT SENSITIVE.

RECORD NUMBER 377  
02/27/86 CODE: LET EPA Q  
NOTIFICATION TO ROSE THAT THEY ARE TO COMPLY WITH  
CLOSURE PLAN OF TSCA APPROVAL. REQUEST UNDER  
CERCLA FOR ROSE TO INFORM OF INTENTION TO CLOSE  
SITE.

RECORD NUMBER 378  
02/27/86 CODE: LET EPA Q  
MORRIS KAY'S LETTER TO ROSE ASKING IF ROSE INTENDS  
TO CLOSE AND IF SO, NOTIFYING THEM THEY MUST CLOSE  
PROPERLY.

RECORD NUMBER 379  
02/27/86 CODE: MEMO EPA R  
TCR REGARDING PHONE CALL FROM DAVID RAMSEY WHO WAS  
IN HOLDEN. REQUESTED RAMSEY TO TAKE PLENTY OF  
PICTURES, DOCUMENT EVERYTHING.

RECORD NUMBER 380  
02/28/86 CODE: PHONE RAMS  
DAVID RAMSEY, CONSUMER SAFETY OFFICER IN JEFFERSON  
CITY, MISSOURI (EPA REGION VII FIELD OFFICE),  
REPORTED TO JUDITH STURGESS THAT HE VISITED MARTHA  
C. ROSE CHEMICAL COMPANY ON FEBRUARY 26 AND 27,  
1986, INVENTORIED MATERIAL.

RECORD NUMBER 381  
02/28/86 CODE: MEMO EPA R  
MEMO TO FILE REGARDING TELEPHONE CONVERSATION WITH  
DAVID RAMSEY WHO PROVIDED INFORMATION THAT HENRY  
ROMPAGE REQUESTED ON 2/27/86.

RECORD NUMBER 382  
02/28/86 CODE: INSP MDNR  
RESULTS OF ANALYSIS COLLECTED BY MDNR IN HOLDEN,  
MISSOURI. DATA ENFORCEMENT SENSITIVE.

RECORD NUMBER 383  
02/28/86 CODE: LET CONG  
LETTER TO ART SPRATLIN CONCERNING WASTE TECH  
SERVICES, INC.

RECORD NUMBER 384  
03/03/86 CODE: SUBPEONA  
HENRY ROMPAGE TO WALTER CAROLAN, RE OPTIONAL  
ANSWER TO SUBPEONA BY MAIL, AFFIDAVIT FORM.

RECORD NUMBER 385  
03/03/86 CODE: PHONE GDYR  
TELEPHONE CONVERSATION RECORD REPORTING THAT ROSE  
IS SOLICITING BUSINESS (HFR).

RECORD NUMBER 386  
03/03/86 CODE: PHONE GEN  
GOODYEAR CALLED LEO ALDERMAN AND REPORTED ROSE  
SOLICITING PCB DISPOSAL BUSINESS OF GOODYEAR.  
WANTED TO KNOW CURRENT STATUS.

RECORD NUMBER 387  
03/04/86 CODE: SUBPEONA  
TSCA SUBPEONA SIGNED BY MORRIS KAY.

RECORD NUMBER 388  
03/04/86 CODE: SUBPEONA  
REQUEST FROM DAVE TRIPP TO MORRIS KAY FOR  
SIGNATURE ON TSCA SUBPEONA; APPEAR IN PERSON  
3/10/86; BRING DOCUMENTS IDENTIFIED IN ATTACHMENT.

RECORD NUMBER 389  
03/04/86 CODE: SUBPEONA  
THE SUBPEONA DEMANDS PRESENTATION OF DOCUMENTS ON  
PCB PROCESSING AND THE FINANCIAL RECORDS TO WALTER  
C. CAROLAN, PRESIDENT, MARTHA C. ROSE CHEMICAL  
RELATING TO PCB PROCESSING.

RECORD NUMBER 390  
03/04/86 CODE: SUBPEONA  
MEMO FROM DAVID TRIPP AND ART SPRATLIN REQUESTING  
REGIONAL ADMINISTRATOR MORRIS KAY TO SIGN TSCA  
SUBPEONA.

RECORD NUMBER 391  
03/05/86 CODE: SUBPEONA  
CERTIFICATE OF DELIVERY OF TSCA SUBPEONA TO WALTER  
C. CAROLAN, BY ANTHONY PETRUSKA.

RECORD NUMBER 392  
03/06/86 CODE: MEMO EPA M  
MEMORANDUM TO FILE REGARDING MEETING WITH GENERAL  
ELECTRIC REPRESENTATIVES. ASKED ABOUT STATUS OF  
FOI REQUEST THAT GENERAL ELECTRIC HAD REGARDING  
ROSE. NO KNOWLEDGE OF THE STATUS

SITE SECURITY. MC CULLERS SAID ROSE STILL RESPONSIBLE FOR SITE SECURITY.

RECORD NUMBER 402  
03/15/86 CODE: CIVIL  
ROSE'S ANSWER AND REQUEST FOR HEARING WAS SUBMITTED TO EPA.

RECORD NUMBER 403  
03/17/86 CODE: LET EPA 0  
LETTER TO U.S. ATTORNEY REQUESTING INITIATION OF ACTION SECTION 11(C) TSCA, REQUIRING ROSE TO COMPLY WITH ADMINISTRATIVE SUBPEONA (HFR).

RECORD NUMBER 404  
03/17/86 CODE: insp epa  
INSPECTION of ROSE TO DETERMINE IF THE FACILITY WAS PROCESSING AFTER MARCH 15, 1986. THEY WERE NOT, BUT VIOLATIONS NOTED IN EARLIER INSPECTIONS WERE NOT CORRECTED.

RECORD NUMBER 405  
03/17/86 CODE: SUBPEONA  
HENRY ROMPAGE'S AFFIDAVIT SUPPORTING EXPORT PETITION FOR ORDER TO SHOW CAUSE ON ENFORCING TSCA SUBPEONA.

RECORD NUMBER 406  
03/17/86 CODE: LET GEN  
OKANOGAN COUNTY OF WASHINGTON'S LETTER TO ROSE ON STATUS OF PCB ITEMS SHIPPED TO ROSE.

RECORD NUMBER 407  
03/17/86 CODE: PHONE OTHR  
TCR REGARDING JEFF FOSTER, COFFEYVILLE, KS. CALLED AND ASKED STATUS OF ROSE AS OF 3/15/86. ROBERT FENEMORE SAID NO EPA ACTION AS OF THIS DATE. DISCUSSED NEODESHA TOWN MEETING ON ROSE.

RECORD NUMBER 408  
03/18/86 CODE: LET ROSE  
ROSE'S SUBMITTAL OF GENERATOR LIST TO EPA.

RECORD NUMBER 409  
03/19/86 CODE: LET ROSE Q  
ROSE LETTER TO EPA STATING THAT ETI WILL DISPOSE OF THE PCBs.

RECORD NUMBER 410  
03/19/86 CODE: PHONE MDNR  
TCR BETWEEN RUBEN MC CULLERS AND JIM PENWALT, MDNR, REGARDING CALL FROM BRILLHART TO LT. GOVERNOR'S OFFICE THAT MCR IS ABANDONED.

03/19/86 CODE: PHONE MDNR  
CALL FROM LT. GOV'S OFFICE (MISSOURI) TO PENFOLD  
(MDNR) CONCERNING ROSE. BASED ON INFORMATION  
RECEIVED FROM MAYOR BRILLHART.

RECORD NUMBER 412  
03/20/86 CODE: MEETING  
ETI AND EPA MEETING. ETI CONTRACTED WITH MARTHA  
C. ROSE TO CLEAN UP SITE WITH BILLING TO THE  
GENERATORS. ETI WILL INVENTORY. ROSE MAY PAY  
PART WITH MONEY FROM \$41,000,000 LAW SUIT AGAINST  
HOLDEN.

RECORD NUMBER 413  
03/20/86 CODE: SUBPEONA  
SHOW CAUSE ORDER FOR FAILURE TO RESPOND TO TSCA  
SUBPEONA.

RECORD NUMBER 414  
03/20/86 CODE: MEETING  
ROSE OFFICIALS, HENRY ROMPAGE AND RUBEN MC CULLERS  
(BOTH OF EPA). RESPONSE TO NOTICE OF INTENT TO  
REVOKE. ROSE STATED THEY PLANNED TO CLOSE HOLDEN  
SITE AND MOVE TO KANSAS AND BUILD PCB INCINERATOR.  
WE EXPLAINED WE WANTED COMPLIANCE WITH  
PERMIT/REGULATIONS BY APRIL 15, 1986, AND THAT WE  
WOULD INSPECT.

RECORD NUMBER 415  
03/21/86 CODE: PHONE GEN  
CONCERNED GENERATOR COUNSEL REQUESTING INFO ON EPA  
HANDLING OF ROSE CASE (WEST TEXAS UTILITIES).

RECORD NUMBER 416  
03/21/86 CODE: SUBPEONA  
EX-PARTE PETITIONS FOR SHOW CAUSE ORDER FOR  
ENFORCEMENT OF TSCA ADMINISTRATIVE INVESTIGATION  
SUBPEONA.

RECORD NUMBER 417  
03/21/86 CODE: LET EPA O  
LETTER FROM LEO ALDERMAN TO DOT REFERRING A MARCH  
5, 1986, LETTER FROM MARTHA C. ROSE FOR ALTERNATE  
CONTAINERS (LETTER IS ATTACHED).

RECORD NUMBER 418  
03/24/86 CODE: SUBPEONA E  
STATUS OF SUBPEONA - ADDITION OF FAILURE TO  
COMPLY WITH CONSENT AGREEMENT TERMS.

RECORD NUMBER 419  
03/26/86 CODE: PHONE ROSE  
ROSE REQUESTING MEETING

ETI TO CLEANUP.

RECORD NUMBER 420  
03/27/86 CODE: LET EPA 0  
LETTER FROM LEO ALDERMAN TO MRS. ELLIE WRIGHT  
REQUESTING HER TO CALL EPA IF SHE HAS INFORMATION  
ON MCR BOOKKEEPING GAINED WHILE EMPLOYED BY MCR.

RECORD NUMBER 421  
03/27/86 CODE: INSP EPA  
ENSV TRANSMITTAL OF DATA FROM THE 3/14/86  
INSPECTION OF HOLDEN POND. NO PCBS DETECTED.

RECORD NUMBER 422  
03/28/86 CODE: LET MDC  
LETTER TO RODMAN REPORTING RESULTS OF SAMPLING IN  
PIN OAK CREEK.

RECORD NUMBER 423  
03/31/86 CODE: LET EPA 0  
LETTER TO KANSAS REPRESENTATIVE EDWIN BIDEAU  
RESPONDING TO HIS 2/28/86 LETTER ON WASTE TECH  
SERVICES, INC.

RECORD NUMBER 424  
04/01/86 CODE: LET EPA 6  
LETTER FROM WALTER CAROLAN TO THE GENERATORS AS TO  
THE STATUS OF MARTHA C. ROSE CHEMICAL COMPANY.

RECORD NUMBER 425  
04/01/86 CODE: D & B  
D & B OF MARTHA C. ROSE; AMERICAN STEEL WORKS,  
INC.; DUST SUPPRESSION, INC.; AND WALTER C.  
CAROLAN CO., INC.

RECORD NUMBER 426  
04/02/86 CODE: SUBPEONA  
JUDGE'S DECISION TO ALLOW MORE TIME FOR RESPONSE  
ON THE SHOW CAUSE ORDER.

RECORD NUMBER 427  
04/03/86 CODE: LET ROSE 0  
ROSE LETTER ABOUT MATERIAL SUBMITTED PER SUBPEONA.

RECORD NUMBER 428  
04/08/86 CODE: MEMO EPA  
CLOSE OF CRIMINAL INVESTIGATION. DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 429  
04/10/86 CODE: INSP EPA  
INTERVIEW WITH FORMER ROSE EMPLOYEE. DATA  
ENFORCEMENT SENSITIVE

RECORD NUMBER 430  
04/11/86 CODE: LST epa G  
LIST OF PCB GENERATORS TO IOWA PUBLIC SERVICE FROM  
ART SPRATLIN.  
<<=

RECORD NUMBER 431  
04/11/86 CODE: LET GEN  
IOWA PUBLIC SERVICE COMPANY LETTER TO EPA  
PROVIDING INFORMATION ON PCBs SHIPPED TO ROSE

RECORD NUMBER 432  
04/14/86 CODE: LET ETI R  
LETTER FROM ROSE TO ETI CONFIRMING AGREEMENT TO  
ACQUIRE ROSE.

RECORD NUMBER 433  
04/14/86 CODE: LET EPA O  
REQUEST FOR INFORMATION OF ROSE AND CAROLAN'S  
RELATED COMPANIES TO MISSOURI SECRETARY OF STATE.

RECORD NUMBER 434  
04/15/86 CODE: INSP MDNR  
ENFORCEMENT SENSITIVE REPORT CONCERNING VIOLATIONS  
AT ROSE.

RECORD NUMBER 435  
04/16/86 CODE: LET GEN  
LOUPE RIVER POWER DISTRICT LETTER TO EPA PROVIDING  
LIST OF MATERIAL SHIPPED TO ROSE

RECORD NUMBER 436  
04/18/86 CODE: INSP EPA  
THE FINAL SAMPLING REPORT ON HOLDEN POND, SAMPLES  
COLLECTED 3/14/86.

RECORD NUMBER 437  
04/22/86 CODE: LET EPA O  
LETTER TO MARK T. PIFHER SPECIFYING INFORMATION  
REQUESTED UNDER FOI 86-200. INFORMATION INCLUDES  
APPROVALS TO MCR AND GENERATORS.

RECORD NUMBER 438  
04/23/86 CODE: LET EPA O  
TRIPP LETTER TO ETI PER 4/17/86 MEETING AND  
DISCUSSION OF DRAFT ETI/ROSE LETTER OF APRIL 14,  
1986. NOTIFIED THEM THAT PERMITS ARE SUBJECT TO  
REVOCATION AND THAT VIOLATIONS EXIST AT THE SITE.  
ETI MAY NOT DISPOSE USING ROSE APPROVALS. ALSO  
STATES THAT TOTAL CLEANUP IS REQUIRED.

RECORD NUMBER 439  
04/23/86 CODE: LET ROSE O  
GOLDSTEIN LETTER ON SUBPEONA RESPONSE.

04/23/86 CODE: LET HOLDEN  
FOI FROM CITY OF HOLDEN REQUESTING COPIES OF  
PERMIT, COMPLAINTS, NOTIFICATIONS OF REVOCATION  
AND CORRESPONDENCE RELATING TO THE ABOVE.

RECORD NUMBER 441  
04/23/86 CODE: LET EPA R  
EPA'S LETTER TO ETI INQUIRING ETI'S POSITION ON  
CLEANUP OF ROSE.  
<<=

RECORD NUMBER 442  
04/24/86 CODE: MEMO USA  
COPY OF JUDGE'S DECISION TO ALLOW ROSE MORE TIME  
TO RESPOND TO SUBPEONA, INCLUDES COPY OF 4/23/86  
APPLICATION BY ROSE FOR MORE TIME.

RECORD NUMBER 443  
04/25/86 CODE: LET GEN  
CONFIRM TELEPHONE DISCUSSION WITH ART SPRATLIN OF  
APRIL 24, 1986, SETTING MEETING WITH GENERATOR  
GROUP FOR MAY 7, 1986, IN KANSAS CITY, KANSAS.

RECORD NUMBER 444  
04/25/86 CODE: LET GEN G  
LETTER FROM MR. FERGUS IN REGARDS TO THE 4/24/86  
MEETING WITH GENERATORS.

RECORD NUMBER 445  
04/28/86 CODE: LITIGATION  
REFERRAL OF ROSE LITIGATION PACKAGE TO MAYS  
(LE-133) FOR REFERRAL TO DOJ.

RECORD NUMBER 446  
04/28/86 CODE: LET ROSE S  
COPY OF ROSE'S RESPONSE TO SHOW CAUSE MOTION TO  
TSCA SUBPEONA.

RECORD NUMBER 447  
04/28/86 CODE: MEMO EPA  
BRIEF MEMO ON LITIGATION PACKAGE FROM DAVE TRIPP  
TO MORRIS KAY.

RECORD NUMBER 448  
04/29/86 CODE: LET EPA L  
LETTER FROM EPA TO DEPARTMENT OF JUSTICE  
TRANSMITTING LITIGATION PACKAGE.

RECORD NUMBER 449  
04/29/86 CODE: LET EPA O  
DRAFT LITIGATION PACKAGE SENT TO REDD, DEPARTMENT  
OF JUSTICE, FOR REVIEW PRIOR TO REFERRAL.



05/01/86 CODE: LET ROSE S  
LETTER TO GENERATORS FROM ROSE IN REGARDS TO  
STATUS OF ETI.

RECORD NUMBER 451  
05/01/86 CODE: LET ETU P  
ETI'S LETTER TO EPA IN REGARDS TO THE CLEANUP  
PLAN.

RECORD NUMBER 452  
05/01/86 CODE: LET ROSE O  
DRAFT LETTER FROM ROSE NOTIFYING THE  
GENERATORSTHAT THEY WERE NO LONGER IN BUSINESS AND  
COULD NOT DISPOSE OFTHE PCBs ON HAND. SUGGESTED  
THEY CONTRACT WITH ETI FOR CLEANUP.

RECORD NUMBER 453  
05/01/86 CODE: LET ETI  
ETI LETTER PER EPD, 4/23/86, LETTER WHEREIN ETI  
STATES A PLANNED 4-PHASE CLEANUP PROGRAM FOR ROSE.

RECORD NUMBER 454  
05/02/86 CODE: LET CWM C  
LETTER FROM CHEM WASTE MANAGEMENT PROPOSING TO  
INCINERATE CAPACITOR CORES FROM ETI.

RECORD NUMBER 455  
05/05/86 CODE: PHONE MAYR  
CONVERSATION NOTES BETWEEN MAYOR BRILLHART AND ART  
SPRATLIN REGARDING PCB ODOR FROM MCR. WANT CITY  
TO CLOSE SEWER FROM PLANT.

RECORD NUMBER 456  
05/06/86 CODE: MEETING  
ENVIROSURE PRESENTED CLEAN-UP PLAN FOR MARTHA C.  
ROSE. ESTIMATED 20M LBS. AND \$20M COST. HAD MET  
WITH WALTER CAROLAN ALREADY.

RECORD NUMBER 457  
05/06/86 CODE: LET ROSE M  
LETTER FROM WALT CAROLAN TO EPA REGARDING  
ASSOCIATION W/ETI - NO OTHERS WELCOME.

RECORD NUMBER 458  
05/06/86 CODE: LET ROSE O  
LETTER STATING THAT ROSE AT THIS TIME CHOSSES ONLY  
TO DEAL WITH ETI ON CLEANUP.

RECORD NUMBER 459  
05/07/86 CODE: MEETING  
GENERATOR MEETING: EPA SPEAKER, ART SPRATLIN.

RECORD NUMBER 460

MEMO FROM POSCHEL (U.S. ATTORNEY) TO HENRY  
ROMPAGE, EPA, PROVIDING A COPY OF ORDER ENTERED  
5/5/86 ON "SHOW CAUSE" ENTERED 3/20/86 FOR ROSE'S  
FAILURE TO RESPOND TO INITIAL SUBPEONA.

RECORD NUMBER 461  
05/08/86 CODE: TCR EPA CU  
S.E.D. CLEANUP REGION IV.

RECORD NUMBER 462  
05/08/86 CODE: LET ETI R  
LETTER FROM ETI TO EPA REGARDING FOUR PHASE  
REMEDIATION PLAN.

RECORD NUMBER 463  
05/08/86 CODE: TCR EPA CU  
S.E.D. CLEANUP - REGION V.

RECORD NUMBER 464  
05/08/86 CODE: MEETING G  
GENERATOR MEETING NOTES, ATTENDEES, IN-HOUSE  
DISCUSSION NOTES.

RECORD NUMBER 465  
05/08/86 CODE: LET EPA C  
MORRIS KAY'S LETTER NOTIFYING ROSE OF ITS VIOLATION  
OF CONSENT AGREEMENT FOR VII-84-T-331 AND THE  
REQUIRED PAYMENT OF THE REMAINING PENALTY  
(\$74,000) WITHIN 20 DAYS OF RECEIPT.

RECORD NUMBER 466  
05/08/86 CODE: AGREEMENT CU  
CLEANUP AGREEMENT BETWEEN ROSE/ETI.

RECORD NUMBER 467  
05/08/86 CODE: LET OHM CU  
LETTER TO ETI FROM COPUS, OHM REGARDING SUBCONTRACT  
CLEANUP.

RECORD NUMBER 468  
05/08/86 CODE: LET NIX D  
LETTER TO ETI FROM DENNIS NIX. AGREEMENT FOR  
DISPOSAL.

RECORD NUMBER 469  
05/08/86 CODE: LET ETI CU  
ETI PROPOSED CLEANUP PLAN (FIRST ADDITION).

RECORD NUMBER 470  
05/08/86 CODE: LET EPA N  
NOTES ON EPA'S POSITION FROM ART SPRATLIN.

RECORD NUMBER 471

RECORD NUMBER 482  
05/16/86 CODE: MEETING  
MEETING BETWEEN ART SPRATLIN, HENRY ROMPAGE, AND  
ETI WHEREIN ETI STATED THEY HAD MANAGEMENT CONTROL  
OF ROSE SITE AND DISCUSSION OF ETI PLANS FOR  
CLEANUP AND BILLING. STATED 25 GENERATORS ALREADY  
SIGNED UP.

RECORD NUMBER 483  
05/16/86 CODE: MEMO SPAUL  
MEMO FROM SPAULDING TO SPRATLIN TRANSMITTING  
REPORTS OF INTERVIEWS CONDUCTED FROM MAY & JUNE  
1985

RECORD NUMBER 484  
05/18/86 CODE: CIVIL  
REGIONAL HEARING CLERK TRANSMITTED TO  
ADMINISTRATIVE LAW JUDGE FINCH OF ROSE'S ANSWER TO  
DOCKET NO. VII-84-T-181.

RECORD NUMBER 485  
05/19/86 CODE: LET GENRAT  
BRADSHAW, NEBRASKA, CONCERNING PCBS SHIPPED TO  
ROSE AND ASKING FOR GUIDANCE.

RECORD NUMBER 486  
05/19/86 CODE: NTFCN EPAC  
NOTIFICATION OF CLEANUP AT ROSE AND OFFER TO ALLOW  
GENERATOR TO CLEANUP OWN MATERIALS. THIS IS A  
FORM LETTER TO GENERATORS OF MATERIALS AT ROSE  
FROM STEVEN KAY.

RECORD NUMBER 487  
05/20/86 CODE: RPT EPA S  
SPILL REPORT REGARDING VISIT TO ROSE FROM HESS TO --  
HENSLEY, EPA LABORATORY EMPLOYEES.

RECORD NUMBER 488  
05/21/86 CODE: TCR EPA S  
TCR FROM RUBEN MC CULLERS REGARDING SPILL -  
DISPOSAL OF OIL.

RECORD NUMBER 489  
05/21/86 CODE: LET JR RD  
LETTER TO ART SPRATLIN FROM JENE ROBINSON  
REQUESTING A DOCUMENT.

RECORD NUMBER 490  
05/21/86 CODE: TCR EPA SR  
SPILL REPORT FROM ART SPRATLIN TO MORRIS KAY.

RECORD NUMBER 491  
05/22/86 CODE: LET EPA CU  
NOTIFICATION OF FINANCIAL RESPONSIBILITY FOR ROSE  
CLEANUP. THIS LETTER IS FROM GEORGE HESS TO  
WALTER CAROLAN, PRESIDENT, MARTHA C. ROSE.

RECORD NUMBER 492  
05/22/86 CODE: MEMO CUP  
STATUS OF ROSE CLEANUP TO CHARLES HENSLEY, EPA  
REGION VII LABORATORY, KANSAS CITY, KANSAS.

RECORD NUMBER 493  
05/22/86 CODE: LET EPA O  
SPRATLIN'S LETTER TO ETI STATING EPA DID NOT  
ENDORSE ETI'S PLAN.

RECORD NUMBER 494  
05/22/86 CODE: LET EPA M  
MEMO TO FILE REGARDING MEETING WITH ETI.

RECORD NUMBER 495  
05/22/86 CODE: TCR EPA SG  
TCR FROM LEO ALDERMAN REGARDING THE STEERING  
COMMITTEE.

RECORD NUMBER 496  
05/22/86 CODE: TCR EPA S  
TCR FROM BOB JACKSON REGARDING WATER ANALYSES -  
SPILL.

RECORD NUMBER 497  
05/22/86 CODE: LET EPA  
LETTER FROM EPA TO WALTER CAROLAN INFORMING HIM  
THAT THE SPILL OCCURRING BETWEEN 5/12-16/86 INTO  
THE STREAM IS A VIOLATION OF THE CLEAN WATER ACT  
AND MUST BE CLEANED UP.

RECORD NUMBER 498  
05/23/86 CODE: CONG  
CONGRESSIONAL RESPONSE TO SENATOR LARRY PRESSLER'S  
LETTER OF 4/28/86 REGARDING A ROBERT FERAGAN'S  
(CONSTITUENT) REQUEST TO MONITOR PCB FACILITIES.

RECORD NUMBER 499  
05/27/86 CODE: LET ROSE O  
COPY OF AGREEMENT BETWEEN ROSE/ETI TRANSMITTED BY  
COUNSEL.

RECORD NUMBER 500  
05/27/86 CODE: LET CS CS  
LETTER TO ART SPRATLIN FROM J. ROBINSON REGARDING  
SELECTION OF CLEAN SITES AS THE NEW CONTACT.

RECORD NUMBER 501  
05/27/86 CODE: LET EPA O  
MEMORANDUM TO CRAIG SMITH FROM SCOTT PEMBERION  
REGARDING CERCLA 106 ORDER.

RECORD NUMBER 502

EPA'S LETTER ASKING ROSE TO SUPPORT CBI STATUS ON  
DOCUMENTS SUBMITTED.

RECORD NUMBER 503  
05/30/86 CODE: PHONE RSAT  
GOLDSTEIN, ROSE'S ATTORNEY, NOTIFIED HENRY ROMPAGE  
THAT SPENSWER, FANE HAD WITHDRAWN FROM ROSE  
BECAUSE OF CONFLICT OF INTEREST. SAID ROSE NEEDS  
ANOTHER WEEK TO GET SUBPEONA DATA TOGETHER.

RECORD NUMBER 504  
05/30/86 CODE: MEMO EPA  
SCOTT PEMBERTON, EPA REGION VII CNSL, MEMO  
DISCUSSING PLANS FOR THE JUNE 3, 1986, MEETING  
WITH ROSE IN RESPONSE TO THE 106 ORDER.

RECORD NUMBER 505  
06/02/86 CODE: REFRAL HQ  
REFERRAL OF ROSE SECTION 17 CASE TO DEPARTMENT OF  
JUSTICE.

RECORD NUMBER 506  
06/02/86 CODE: MEMO HQ  
MEMO FROM MAYS (OECM) STATING THAT HE CONCURRED ON  
THE SECTION 17 CHARGES AGAINST ROSE AND HAS  
REFERRED THE CASE TO JUSTICE.

RECORD NUMBER 507  
06/03/86 CODE: MEETING  
NOTES ON 106 MEETING WITH ROSE. MEETING DISCUSSED  
SPILL CLEANUP, FENCING, ETI INVOLVEMENT (CLAIMED  
NO RESPONSIBILITY, BUT WORKED ANYWAY), COMPLETE  
SITE CLEANUP AND DEADLINE FOR ROSE. ATTENDEES OF  
THE MEETING WERE ROSE, ETI, HOLDEN, LEAR/SIEGLER,  
EPA, EPA CONTRACTOR (BLACK AND VEATCH). ROSE  
CLAIMED SLUDGE FROM ANOTHER SOURCE.

RECORD NUMBER 508  
06/03/86 CODE: MEMO-CLNUP  
UPDATE OF ROSE CLEANUP TO CHARLES HENSLEY.

RECORD NUMBER 509  
06/03/86 CODE: LET ETI PP  
LETTER TO ILLINOIS POWER FROM S. KAY, ETI, ON  
ETI'S PROPOSED PLAN.

RECORD NUMBER 510  
06/05/86 CODE: LET EPA O  
EPA LETTER TO CITY OF BRADSHAW, NEBRASKA,  
RESPONDING TO THEIR 5/19/86 LETTER.

RECORD NUMBER 511  
06/05/86 CODE: LET ATTY A  
LETTER TO ATTORNEY ANDERSON FROM SCOTT PEMBERTON  
REGARDING CONFIRMATION OF 6/3/86 AGREEMENTS.

RECORD NUMBER 512  
06/05/86 CODE: TCR EPA ET  
TELEPHONE CONVERSATION RECORD WITH J. ROBINSON  
REGARDING CONVERSATION WITH ETI.

RECORD NUMBER 513  
06/05/86 CODE: LET ATTY A  
LETTER TO KULINOWSKI FROM PEMBERTON RE  
CONFIRMATION OF 6/3/86 AGREEMENTS.

RECORD NUMBER 514  
06/06/86 CODE: LET ETO TA  
LETTER FROM ET1 TO MARTHA C. ROSE TERMINATING  
AGREEMENT.

RECORD NUMBER 515  
06/09/86 CODE: LET ATTY R  
RESPONSE FROM ANDERSON TO SCOTT PEMBERTON'S 6/5/86  
LETTER.

RECORD NUMBER 516  
06/10/86 CODE: LET EPA O  
EPA'S LETTER, SIGNED BY MORRIS KAY, TO HABICHT  
CONCERNING ADDITION OF FAILURE TO COMPLY WITH TSCA  
CONSENT AGREEMENT, ADDED TO THE CASE REFERRED TO  
THE DEPARTMENT OF JUSTICE.

RECORD NUMBER 517  
06/10/86 CODE: LET JUST O  
RECEIPT OF EPA REFERRAL ON MARTHA C. ROSE CHEMICAL  
COMPANY.

RECORD NUMBER 518  
06/10/86 CODE: LET ATTY I  
LETTER FROM ANDERSON TO PEMBERTON REGARDING  
INVENTORY PLAN.

RECORD NUMBER 519  
06/10/86 CODE: LET EPA CP  
LETTER FROM DAVID TRIP TO DEPT. OF JUSTICE  
(HABICHT), REQUESTING ACTION TO COLLECT UNPAID  
CIVIL PENALTY.

RECORD NUMBER 520  
06/10/86 CODE: LET DOJ CR  
LETTER FROM DEPT. OF JUSTICE TO EPA HEADQUARTERS  
ASSIGNING CIVIL REFERRAL TO BRYAN REDD.

RECORD NUMBER 521  
06/10/86 CODE: LET ATTY S  
LETTER FROM ANDERSON TO PEMBERTON REGARDING  
SAMPLING PLAN.

RECORD NUMBER 522  
06/10/86 CODE: LET ATTY F

PLAN.

RECORD NUMBER 523  
06/11/86 CODE: LET SNEW D  
LETTER FROM SOUTH NORWALK ELECTRIC WORKS TO EPA  
REGARDING DOCUMENTS OF DISPOSAL WITH ROSE.

RECORD NUMBER 524  
06/11/86 CODE: LET ETI  
LETTER FROM ETI RESPONDING TO MDNR LETTER OF JUNE  
3, 1986, STATING THAT ROSE IS RESPONSE PARTY FOR  
MAY 16, 1986 SPILL.

RECORD NUMBER 525  
06/16/86 CODE: MEMO CLNUP  
MEMO FROM CHARLES HENSLEY TO ROBERT MORBY  
REGARDING CLEANUP ACTIVITIES AT ROSE (REPORT BY  
ROBERT FINE, REGION VII TATM).

RECORD NUMBER 526  
06/19/86 CODE: LET ROSE D  
ROSE LETTER ASKING FOR RETURN OF CBI DATA.

RECORD NUMBER 527  
06/19/86 CODE: LET ROSE D  
ROSE LETTER REQUESTING RETURN OF ALL SUBMITTED  
C.B.I.

RECORD NUMBER 528  
06/23/86 CODE: LET SHW D  
LETTER FROM SCHIFF, HARDIN & WAITE TO EPA  
REGARDING ETI'S SOLICITING FOR DISPOSAL.

RECORD NUMBER 529  
06/24/86 CODE: LET EPA D  
EPA'S LETTER RESTATING NEED TO SUPPORT CBI STATUS,  
DEMANDING RETURN NOT ACCEPTABLE.

RECORD NUMBER 530  
06/26/86 CODE: LET ROSE D  
- ROSE LETTER DEMANDING RETURN OF ALL SUBMITTED  
CONFIDENTIAL BUSINESS INFORMATION.

RECORD NUMBER 531  
06/26/86 CODE: LET ROSE D  
MARTHA C. ROSE'S LETTER TO EPA'S LETTER OF JUNE  
24, 1986, DEMANDING RETURN OF ALL CBI DATA.

RECORD NUMBER 532  
06/26/86 CODE: LET EPA D  
WILLIAM A. SPRATLIN'S LETTER TO MARTHA C. ROSE  
DENYING CLAIM OF PRIVACY ACT VIOLATION POSED IN  
MARTHA C. ROSE'S LETTER OF JUNE 26, 1986.

RECORD NUMBER 533  
06/26/86 CODE: LET MDNR  
LETTER TO ROSE FROM MDNR REQUIRING REPORTING OF  
THE PCB SPILL OF MAY 16, 1986.

RECORD NUMBER 534  
06/27/86 CODE: LET EPA S  
LETTER FROM EPA TO ETI REGARDING THEIR  
SOLICITATIONS TO GENERATORS.

RECORD NUMBER 535  
06/28/86 CODE: TCR EPA B  
RECORD OF COMMUNICATION FROM LYNN HARRINGTON,  
RCRA, RE TELEPHONE CONVERSATION WITH MAYOR  
BRILLHART, HOLDEN.

RECORD NUMBER 536  
06/28/86 CODE: LET EPA D  
MEMO FROM CHARLES HENSLEY TO BILL KEFFER (BOTH  
FROM EPA REGION VII LABORATORY) RE ANALYSIS OF  
SAMPLES FROM ROSE - HOLDEN.

RECORD NUMBER 537  
07/01/86 CODE: LET EPA C  
ADMINISTRATIVE LAW JUDGE JONES TO ROSE ATTORNEY  
AND CNSL, EXTENDING TIME FOR FILING PREHEARING  
EXCHANGE "TO A DATE TO BE SET."

RECORD NUMBER 538  
07/01/86 CODE: LET MDNR W  
LETTER FROM JAMES MC CONATHY, MISSOURI DEPARTMENT  
OF NATURAL RESOURCES TO DONALD TOENSING, EPA WATER  
MANAGEMENT DIVISION REGION VII, REGARDING ANALYSIS  
OF SAMPLES OF WATER, WASTE WATER, WASTE SLUDGE,  
SOIL FROM PRIVATE PROPERTIES, AND SEDIMENT IN  
HOLDEN AREA.

RECORD NUMBER 539  
07/02/86 CODE: LET EPA O  
DAVID TRIPP'S LETTER TO MARTHA C. ROSE CONCERNING  
DECLASSIFICATION OF CONFIDENTIAL BUSINESS  
INFORMATION.

RECORD NUMBER 540  
07/07/86 CODE: LET EPA O  
HENRY ROMPAGE'S LETTER TO MARTHA C. ROSE DEMANDING  
FULL SERVICE OF SUBPEONAED DOCUMENTS BY JULY 11,  
1986.

RECORD NUMBER 541  
07/08/86 CODE: LET ROSE  
RUCKER (PARTNER OF ANDERSON) SAYS ANDERSON OUT OF  
TOWN AND CANNOT RESPOND TO OUR JULY 7, 1986,  
LETTER.

RECORD NUMBER 542



REVOCATION OF CAPACITOR PROCESSING APPROVAL.

RECORD NUMBER 543  
07/09/86 CODE: REVOCATION  
REVOCATION OF TRANSFORMER PROCESSING APPROVAL.

RECORD NUMBER 544  
07/09/86 CODE: PHONE ROSE  
ANDERSON'S STAFF CALLED TO TELL HENRY ROMPAGE THAT  
ANDERSON ON VACATION UNTIL JULY 14, 1986, AND  
WOULD NOT BE ABLE TO RESPOND TO LETTER.

RECORD NUMBER 545  
07/09/86 CODE: REVOCATION  
NOTIFICATION THAT WE WOULD NOT REVIEW FOR RENEWAL  
OF THE OIL PROCESSING APPROVAL.

RECORD NUMBER 546  
07/10/86 CODE: INSP EPA  
TSCA INSPECTION OF CHARLES BUXTON. DATA  
ENFORCEMENT SENSITIVE.

RECORD NUMBER 547  
07/10/86 CODE: INSP EPA  
TSCA INSPECTION OF MR. MCCOY. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 548  
07/10/86 CODE: MEMO EPA  
MEMO FROM HESS TO HENSLEY REPORTING VISIT TO MCR  
SITE ON 7-3-86

RECORD NUMBER 549  
07/14/86 CODE: LET EPA Q  
DAVID TRIPP LETTER TO NEW SWYRNA BEACH, FL,  
UTILITIES COMMISSION REGARDING ETI/ROSE.

RECORD NUMBER 550  
07/15/86 CODE: PHONE BECK  
BECK (GENERATOR COUNSEL) TO HENRY ROMPAGE STATING  
THAT ROSE HAD BEEN SERVED ON BANKRUPTCY. ANDERSON  
DENIED. PLAINTIFFS SENDING REQUEST FOR PRODUCTION  
OF DOCUMENT, INTERROGATIONS, INSURANCE  
AND GENERATOR LIST. THEY PLAN TO DISPOSE WALTER  
AND JIM CAROLAN ASAP.

RECORD NUMBER 551  
07/15/86 CODE: INSP EPA  
TSCA INSPECTION OF MRS. DONNA THOMAS. DATA  
ENFORCEMENT SENSITIVE.

RECORD NUMBER 552  
07/18/86 CODE: INSP EPA  
TSCA INSPECTION UNDER AUTHORITY OF SEARCH WARRANT

SENSITIVE.

RECORD NUMBER 553  
07/18/86 CODE: INSP EPA  
TSCA INSPECTION UNDER AUTHORITY OF SEARCH WARRANT  
OF DWIGHT THOMAS'S PREMISES. DATA ENFORCEMENT  
SENSITIVE.

RECORD NUMBER 554  
07/23/86 CODE: LET EPA C  
LETTER FROM TRIPP TO ROMAN SUBMITTING COPIES.

RECORD NUMBER 555  
07/24/86 CODE: MEMO EPA S  
MEMO FROM CHARLES HENSLEY TO LEO ALDERMAN  
REGARDING PCB SPILL INVESTIGATION BY RICHARD  
NICKLE, REGION VII TATM (REPORT DATED 7/22/86).

RECORD NUMBER 556  
08/01/86 CODE: LET EPA O  
HENRY ROMPAGE'S LETTER RESENDING JULY 2, 1986,  
LETTER OF WAIVING CBI CLAIM.

RECORD NUMBER 557  
08/01/86 CODE: LET EPA C  
CONGRESSIONAL TO AND FROM IKE SKELTON, MISSOURI,  
ON BEHALF OF FRANCIS BRILLHART, MAYOR OF HOLDEN,  
REQUESTING INFORMATION ON INCINERATION OF PCBs.

RECORD NUMBER 558  
08/05/86 CODE: LET ROSE O  
LETTER REQUESTING COPIES OF THE THREE PERMIT  
APPLICATIONS AS PER OUR JULY 9, 1986, REVOCATION.

RECORD NUMBER 559  
09/15/86 CODE: PPR EPA R  
NEWSPAPER ARTICLE FROM KANSAS CITY STAR RE PCB  
INCINERATOR AT-MCR-HOLDEN.

RECORD NUMBER 560  
09/23/86 CODE: INSP EPA  
INSPECTION OF RIG INDUSTRIES OF KANSAS CITY,  
MISSOURI, TO SAMPLE METAL THAT ALLEGEDLY WAS FROM  
ROSE.

RECORD NUMBER 561  
09/29/86 CODE: PPR EPA R  
NEWSPAPER ARTICLE FROM KANSAS CITY STAR RE MCR'S  
DESIRE TO BRING AN INCINERATOR TO HOLDEN,  
MISSOURI.

RECORD NUMBER 562  
09/30/86 CODE: LET EPA C  
REGIONAL HEARING CLERK TO ROSE ATTORNEY, ENCLUSING  
COPY OF CONSENT AGREEMENT RE TSCA DUCKET

RECORD NUMBER 563  
11/06/86 CODE: INSP EPA  
CRIMINAL INVESTIGATION NO. 1 DATA ENFORCEMENT  
SENSITIVE

RECORD NUMBER 564  
11/06/86 CODE: INSP EPA  
CRIMINAL INVESTIGATION NO. 2 DATA ENFORCEMENT  
SENSITIVE

Record is out of range  
?

goto rec  
Called from - A:LISTOUT.prg  
Terminate command file? (Y/N) Yes  
Do cancelled  
. ESIXIT